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

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

### Racketeering – (RICO series offenses)

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

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

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

### Thefts and Takings Targeted at Personal Assets

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

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

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

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

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

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

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

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

Complaint paragraphs:  991., 170, 219, 222, 226, 275(i), 276, 320f(iv), 337, 414-534, 543, 563; 601 602 NSEC-2, 3; 612, 613 HEXP-9, 10; 623, 624, 626, 627A, 629 RGTS-3, 4, 6, 7, 9; 640-653, 655, 656C, 658-661, 667, 668, 670, 672-693 RICO-2-15, 17, 18, 20-23, 29, 30, 32, 34-54  Appendix 2 paragraphs:  1-007 through 1-010, 1-015, 1-017 through 1-023, 1-025, 1-031, 1-032, 1-067  LPEE Table 2 pages 12023- 12120 paragraphs:  2-0001, 2-0036, 2-0039, 2-0045, 2-0047, 2-0050, 2-0053 through 2-0058, 2-0059, 2-0061, 2-0013, 2-0113, 2-0114, 2-0115, 2-0117, 2-0122, 2-0134, 2-0135, 2-0140, 2-0141, 2-0115, 2-0157 through 2-0164, 2-0165 through 2-0179, 2-0185, 2-0186, 2-0195, 2-0202, 2-0207; entirety of column entitled: Actions: Destroy Career, Businesses; Pretext, Entrap, Incriminate  LPEE pages (see technical note on page numbering at paragraph 230):  1 et al, 11-139, 140 et al, 371, 380, 382, 383-384, 386, 398, 420, 427, 430-438, 440, 463, 473, 474, 486, 518, 549, 542-547, 566-573, 575-576, 599, 602, 603, 609-612, 616-765, 767-768, 770-771, 783, 1740, 6085, 8209, 8291-8293, 8350-8355, 8351-8352, 8370-8373, 8378, 8379, 8411, 8454-8467, 8472-8473, 8474, 8479, 8489-8506, 8507-8514, 8563-8714, 8715-8718, 8770-8787, 8788-8804, 8805-8812, 8813-8854, 8937-8938, 8939-8955, 8956, 9053-9059, 9068-9078, 9093, 9094, 9181, 9193, 9194-9206, 9207-9214, 9219-9222, 9240, 9241-9248, 9256-9259, 9260, 9270-9272, 9275-9276, 9277, 9278-9279, 9280, 9281-9283, 9385, 9300-9306, 9307-9310, 9311, 9312-9313, 9314-9318, 9328-9337, 9340-9391, 9392-9393, 9394-9401, 9406-9534, 9538, 9539, 9545, 9547, 9548-9561, 9663, 9637, 9639, 9642, 9645, 9646-9647, 9649, 9651, 9653, 9722, 9727-9728, 9788-9700, 9820,	Interline Exhibits:	4 through 14
623, 624, 626, 627A, 629 RGTS-3, 4, 6, 7, 9; 640-653, 655, 656C, 658-661, 667, 668, 670, 672-693 RICO-2-15, 17, 18, 20-23, 29, 30, 32, 34-54  Appendix 2 paragraphs:  LPEE Table 2 pages 12023- 12120 paragraphs:  2-0001, 2-0036, 2-0039, 2-0045, 2-0047, 2-0050, 2-0053 through 2-0058, 2-0059, 2-0061, 2-0068, 2-0072, 2-0081, 2-0117, 2-0112, 2-0110, 2-0111, 2-0113, 2-0114, 2-0115, 2-0117, 2-0122, 2-0134, 2-0165 through 2-0164, 2-0165 through 2-0179, 2-0185, 2-0186, 2-0195, 2-0202, 2-0207; entirety of column entitled: Actions: Destroy Career, Businesses; Pretext, Entrap, Incriminate  LPEE pages (see technical note on page numbering at paragraph 230):  LPEE pages (see technical note on page numbering at paragraph 230):  LPEE pages (see technical note on page numbering at paragraph 242, 427, 430-438, 440, 463, 473, 474, 486, 518, 549, 542-547, 566-573, 575-576, 599, 602, 603, 609-612, 616-765, 767-768, 770-771, 783, 1740, 6085, 8290, 8291-8293, 8350-8355, 8351-8352, 8370-8373, 8378, 8379, 8411, 8454-8467, 8472-8473, 8474, 8479, 8489-8506, 8507-8514, 8563-8714, 8715-8718, 8770-8787, 8788-804, 8805-8812, 8813-8854, 8937-8938, 8939-8955, 8956, 9053-9059, 9068-9078, 9093, 9094, 9181, 9193, 9194-9206, 9207-9214, 9219-9222, 9240, 9241-9248, 9256-9259, 9260, 9270-9272, 9275-9276, 9277, 9278-9279, 9280, 9281-9283, 9285, 9300-9306, 9307-9310, 9311, 9312-9313, 9314-9318, 9328-9337, 9340-9391, 9392-9393, 9394-9401, 9406-9534, 9538, 9539-9545, 9547, 9548-9561, 9568-9572, 9573-9591, 9601-9604, 9610-9611, 9636-9637, 9639, 9642, 9645, 9645, 9646-9647,	Complaint paragraphs:	
Appendix 2 paragraphs:   1-007 through 1-010, 1-015, 1-017 through 1-023, 1-025, 1-031, 1-032, 1-067		
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2-0117, 2-0122, 2-0134, 2-0135, 2-0140, 2-0141, 2-0150, 2-0157 through 2-0164, 2-0165 through 2-0179, 2-0185, 2-0186, 2-0195, 2-0202, 2-0207; entirety of column entitled: Actions: Destroy Career, Businesses; Pretext, Entrap, Incriminate  LPEE pages (see technical note on page numbering at paragraph 230):  1 et al, 11-139, 140 et al, 371, 380, 382, 383-384, 386, 398, 420, 427, 430-438, 440, 463, 473, 474, 486, 518, 549, 542-547, 566-573, 575-576, 599, 602, 603, 609-612, 616-765, 767-768, 770-771, 783, 1740, 6085, 8290, 8291-8293, 8350-8355, 8351-8352, 8370-8373, 8378, 8379, 8411, 8454-8467, 8472-8473, 8474, 8479, 8489-8506, 8507-8514, 8563-8714, 8715-8718, 8770-8787, 8788-8804, 8805-8812, 8813-8854, 8937-8938, 8939-8955, 8956, 9053-9059, 9068-9078, 9093, 9094, 9181, 9193, 9194-9206, 9207-9214, 9219-9222, 9240, 9241-9248, 9256-9259, 9260, 9270-9272, 9275-9276, 9277, 9278-9279, 9280, 9281-9283, 9285, 9300-9306, 9307-9310, 9311, 9312-9313, 9314-9318, 9328-9337, 9340-9391, 9392-9393, 9394-9401, 9406-9534, 9538, 9539-9545, 9547, 9548-9561, 9568-9572, 9573-9591, 9601-9604, 9610-9611, 9636-9637, 9639, 9642, 9645, 9646-9647,	12120 paragraphs:	
2-0157 through 2-0164, 2-0165 through 2-0179, 2-0185, 2-0186, 2-0195, 2-0202, 2-0207; entirety of column entitled: Actions: Destroy Career, Businesses; Pretext, Entrap, Incriminate  LPEE pages (see technical note on page numbering at paragraph 230):  1 et al, 11-139, 140 et al, 371, 380, 382, 383-384, 386, 398, 420, 427, 430-438, 440, 463, 473, 474, 486, 518, 549, 542-547, 566-573, 575-576, 599, 602, 603, 609-612, 616-765, 767-768, 770-771, 783, 1740, 6085, 8290, 8291-8293, 8350-8355, 8351-8352, 8370-8373, 8378, 8379, 8411, 8454-8467, 8472-8473, 8474, 8479, 8489-8506, 8507-8514, 8563-8714, 8715-8718, 8770-8787, 8788-8804, 8805-8812, 8813-8854, 8937-8938, 8939-8955, 8956, 9053-9059, 9068-9078, 9093, 9094, 9181, 9193, 9194-9206, 9207-9214, 9219-9222, 9240, 9241-9248, 9256-9259, 9260, 9270-9272, 9275-9276, 9277, 9278-9279, 9280, 9281-9283, 9285, 9300-9306, 9307-9310, 9311, 9312-9313, 9314-9318, 9328-9337, 9340-9391, 9392-9393, 9394-9401, 9406-9534, 9538, 9539-9545, 9547, 9548-9561, 9568-9572, 9573-9591, 9601-9604, 9610-9611, 9636-9637, 9639, 9642, 9645, 9646-9647,		
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10137, noting entries for Arizona destinations and		
locations, 10750-10771, 10179-10186, noting		

	disbursements on (yymmdd) 210706 Delta \$534.40, 210707 JFK \$22.90, 210707 Motel 6 \$2121.54, 210708 Africa Lounge \$23.81, SEPTA \$9.25; 10108-10118, 10138-10613, 11641, 11704-11707, 11708-11726, LPEEV65-6, 7, 8, 9,12
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Emails and documents by topic and date, also located in LPEE:	documentation to be provided in discovery.  See emails and documents listed at all relevant individual subcounts in RICO series and all other subcounts in other
Disbursements in Interstate Commerce (partial listing only, bank statements to be produced during discovery process):	series listed at Complaint paragraphs above.  130101 Winnett Perico 2013 Expenses P&L 130101.pdf 130926 JACKSON fee from BA personal acct130926.pdf 150730 Smith 100K Check 150730.pdf 150822 Inv Blue Sky Search150822.pdf 150824 Vista Bus Cards Pd 150824.pdf 150825 Pd Inv Org Trade Assn150825.pdf 150825 Pd Inv Tucson Intel Ofc 150825.pdf 150828 D Brewer Expense report 150824.pdf 150831 PETERSEN 25K Inv Check 150831.pdf 150901 Pd Inv Tucson Intel Ofc 150901.pdf 150916 D Brewer Expense report 150916.pdf 151116 D Brewer Expense Report 151116.pdf 151231 D Brewer Expense Report 151231.pdf 170126 Smith 5K Wire 170126.pdf 170315 Smith Active 1K Wire170315.pdf 170930 WCC Balance Sheet Only 9-30-2017 170930.pdf 180131 NBH 7469-BUSINESS CHECKING-20180131.pdf 180228 NBH 7469-BUSINESS CHECKING-20180228.pdf 180308 Lance Surety Livestock Dlr Bond 180308.pdf

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

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

10/4 CARDONE intro of John Kiely - trust attny 10/11 Micheal Callahan (KEENE), DD 10/18 Ron MCCORMICK, WALMART Senior Director, Fresh, WebEx call 10/26 John Cecilian, Clutch 10/27 Jim Case, Champion (re housing at Hyder farm, AZ11/3 Jim Case 11/4 Lance Troutman 11/9 Jacob KREMPEL & Jose MERCED, KROGER re organic produce in KPPC Conference room, Blue Vine, OH 11/10 Dan Davidson re soils and gypsum addition 11/14 Michael Callaahn (KEENE), DD, meeting at NYC office on Lexington Ave 11/21 Chris Nichols, Ryder, re update 11/23 Ken Ferguson re Hyder ag housing 11/29 Britney Smith re Hyder ag housing 2017 1/6 Sarah Freese re IBM marketing cloud 1/27 Dan KREWSON, MULTIFUNDING re loans 2/6 SHEFFORD Wire Transfer 2/8 Kingman, AZ farm visit w/ Christine J VOLK, realtor, and Jonathan CROSS (BLACKPOOL/SHEFFORD), Bruce Blitch 2/17 C Arkin 2/21 WALMART Bentonville, AR - Meeting with Ron MCCORMICK, Shawn Baldwin, others in WALMART second floor GPS conference room 2/22 Jim Case, Chamion re Gerlach, NV, Hyder, AZ, Kingman, AZ agricultural worker housing 2/23 C Arkin, NetSuite, review of NetSuite Professional Services statement of work 2/24 SHEFFORD closing sked 2/27 J. Buddy Persons re Constsvcs ag housing 2/27 C Nichols, Ryder reupdated fleet needs 2/28 Dave Wanders, Utica Leaseco 4/6 Wendy Berger, re refrigerated facilities development 4/26 Steve Monroe, re factor financing NJ 5/18 M Callahan (KEENE), DD and staff meeting at DD Lexington Avenue offices, NYC 7/11 G Troutman, telcon re SPAC meeting at Chardan offices, Battery Park, NYC 7/11 EarlyBird telcon re SPAC meeting at their offices

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Evidentiary materials related to this specific subcount follow:

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

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

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

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

C. In May and June 2010, Lead Plaintiff composed and filed a US District Court

Complaint in Newark, NJ on June 23, 2010, naming USSS and FBI as lead defendants. Lead

Plaintiff did not then remotely understand the full scope of the associated-in-fact enterprise and
conspiracy, and presumed those parties may have been the primary perpetrators, and lacked the
specific positive identifications which he has developed since beginning forensic analysis in

mid-2021 and has been able to develop since September 2023, which served to highlight the full

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

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

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

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

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

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

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

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

Source: Website\_Involuntary\_Patients\_Legal-Rights\_2.23.2021.pdf located at disabilityrightsnj.org
The involuntary commitment in Bergen Regional Medical Center from October 2, 2010 to
March 31, 2011 by these defendants violated the Lead Plaintiff's civil rights as follows:

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

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

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

- I. A few days into this involuntary commitment, after refusing medication because the nurse would not tell him the names or the effects of the medications being administered orally, he was placed in a padded cell overnight and forcibly medicated by three large male orderlies with an injection in the buttocks. During this six month confinement period, he was transferred among various wards three or four times, experienced a violent indirect threat, experienced indirect physical violence, and a suicide trauma trigger attempt was perpetrated, had limited access to indoor exercise facilities intermittently and had virtually no outdoor access, which outdoor access consisted of a maximum of two minutes less than once each week as he walked from the main entrance to the behavioral facility entrance at the hospital. If in criminal confinement, this would constitute a clear violation of the *Eighth* Amendment prohibition on cruel and unusual punishment.
- J. Since NJ state law states that a hospital may only release admitted patients to safe housing, and he had no access to housing or funds that he was then aware of, had been informed there were no shelter beds available upon this specific inquiry of the floor social worker Sinisi,

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

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

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

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

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

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

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

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

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

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

- B. Litigation, including compromises of funds legally due and legal expenses and fees, as imposed by defendant UNITED STATES in violation of 18 U.S.C. § 1589(3), was also required to attempt recovery of stolen and/or promised funds and compensation in both personal matters and in closely held commercial enterprises, all while engaged in interstate commerce and, in some case, on federally funded projects:
  - (i) 1990: Alliance for a stolen project account receivable payment of approximately \$165,000, ostensibly to Steve's Maintenance from the Bates Vocational-Technical Institute project in Tacoma, WA, with eventual recovery of about \$82,000, a loss of \$83,000, plus legal fees paid;
  - (ii) 1993: Forced personal bankruptcy litigation expenses resulting from the deliberate fraudulent financing by CORNWELL, Shearing, Wozow (acting through Pacific Financial Services, Bellevue, WA, paragraph 448);
  - (iii) 1993: LaserAccess (formerly LazerSoft when run by Lead Plaintiff) for recovery of \$40,000 of post-merger sales bonuses awarded in 1989 with an eventual recovery of \$22,000 coming from defendant Stephen M. WATERS rather than the entity itself, a loss of \$18,000 plus legal fees paid;
  - (iv) 1993: PAN, CORNWELL, Ron WILLIAMS, as an employer promised and then denied compensation by using the fraudulent subterfuge of accounts receivable factoring fraud, a loss of approximately \$65,000 to \$125,000;
  - (v) 1994: Forced to pay \$2,200 of legal fees after leaving P.A.N. Environmental Services(PAN) by a supposed freelancer seeking payment for an unpaid PAN bill for serviceswhich had to be defended to avoid a default judgment;

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

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

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

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

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

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

Interline Exhibits:	6, 11
Complaint paragraphs:	626 RGTS-6, 629 RGTS-9, 640-645, 650, 655, 680-693 RICO-2 through RICO-7, RICO-12, RICO-17, RICO-42 through RICO-54, 652 RICO-14; 639-648 RICO-1-10 generally
Appendix 2 paragraphs:	
LPEE Table 2 pages 12023-	2-0001, 2-0047, 2-0056, 2-0057, 2-0110, 2-0111, 2-0113, 2-
12120 paragraphs:	0114, 2-0134, 2-0185, 2-0186
LPEE pages (see technical note on page numbering at paragraph 230):	A. 140 et al, 8472-8473, 9601-9604, 9610-9611, 9788- 9790, 9925, 9926, 9997, 10004
paragraph 250).	B(v) 10445-10471
	B(vi) 10467-10527
Emails and documents by topic	COSTCO GC reply to verficiation request 211102,
and date, also located in LPEE:	D Brewer reply to DOJ OIG decline ltr 220325
	Performa (Allegent dba) v ShipNow 220818 040210.pdf
	040713 Allegent ShipNow Confirmation of Joinder
	040713.pdf
	040713 Allegent ShipNow Dismissal With Prejudice 040713.pdf
	040713 Brewer Allegent ShipNow Docket Sheet 040713.pdf
	040713 Brewer ShipNow Amended Complaint 040713.pdf
	040713 Brewer ShipNow Disclosure 040713.pdf
	040713 Brewer ShipNow Notice of Appearance 040713.pdf 10445-10467
	030122 Brewer CNA Brewer Counsel LARSON 030122.pdf
	030122 Brewer CNA CNA Motion for Summary Judgment 030122.pdf
	030122 Brewer CNA Decl Amount Due etc 030122.pdf 10468-10527
	030122 Brewer CNA Docket Sheet 030122.pdf
	030122 Brewer CNA Plaintiff Brewer Ans 030122.pdf
	030122 Brewer CNA Summons and Complaint 030122.pdf
	Smith 100K Check 1of2 150730.pdf Smith 100K Check
	200f2 150730.pdf
	Smith 100K Subscription Agreement
	SKMBT C36415072911310 DB Signed 150729.pdf
	Smith Litigation Halt Proposal to resume company
	operations 200106.pdf
	Smith Litigation SULLIVAN Winnett - WCC Letter
	Respond to Evers-DSmith 190621.pdf

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

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

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

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

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

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

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

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

Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626

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

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

#### Racketeering - Personal Color of Law Entrapments

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

MAGGARD TX status 201015, MAGGARD re Korea Angus pgm etc 210118, MAGGARD re 26 Ranch and ABDELSAYED 210221, MAGGARD on ABDELSAYED positive connect 210222, MAGGARD re ABDELSAYED 210302, MAGGARD re ABDELSAYED to Egypt 210304, MAGGARD on loan docs PFS need 210306, MAGGARD re gty and PFS 210307. MAGGARD re Big Sandy BAFO 210322, MAGGARD re Big Sandy reprise 210505, MAGGARD re investors and Big Sandy 210519, MAGGARD re Lake County LOI 210701, MAGGARD re Lake County 210702, MAGGARD re 500k loan 210703, MAGGARD enroute Lake County 210707, MAGGARD re Lake County enroute 210707, MAGGARD re Lake Copunty tour and plus minus issues 210709, MAGGARD re Lake County and pers FICo improvement 210715, MAGGARD re Lake County 210719, MAGGARD Loan to DB improving FICO 210721, MAGGARD re Lake County 3559 LOI 210721, MAGGARD on Lake County Fin snags 210725, MAGGARD on WMT Wagyu comp price and other status 210804, MAGGARD re startup sequencing plan 210816, MAGGARD re status web dev sales 210816, MAGGARD re add subs WEFUNDER 210817, MAGGARD re GAAP fin need 210818, MAGGARD re mkt gap 210818, MAGGARD 5k GPR loan 210826, MAGGARD re 4500 loan recvd 210826, MAGGARD Revised GPR Startup Plan 210830, MAGGARD re DB overadvance 210901, MAGGARD re loan not pursued 210903. MAGGARD re 26k loan 210909, MAGGARD re ICPO LOI-FM-LZ-210913, MAGGARD re Terminating Trader efforts 210916, MAGGARD re status 211104. MAGGARD re 700 211221, SOLE SOURCE cold email hit 171219, SOLE SOURCE feedback 171222, SOLE SOURCE call 171226, SOLE SOURCE NDA Double D feedyard 171227,

SOLE SOURCE TURNER phenom news HEC etc 180105,

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

#### Racketeering – Targeting Small Business And Enterprise

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

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

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

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

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

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

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

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

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

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

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

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

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

#### 650. RICO-12 Racketeering Violations: Theft of Receivables, Check Frauds 1990 to present

A. As forensically reverse engineered, defendant UNITED STATES has and does conspire with other defendants, both named and not yet identified, without limitation, as it (i) plans and conducts thefts of property by various alternate means (paragraphs 490-516, Interline Exhibits 13, 14), (ii) evades and/or totally avoids payments of legally due accounts receivable in its cover company operations, and (iii) purveys fraudulent unfunded bank checks to Lead Plaintiff and to his in-state and interstate commercial businesses. Defendants have and do systematically conspire and act to (iv) deprive Lead Plaintiff of personal and business financial resources, (v) force litigation for recovery or partial recovery of assets and sums due, (vi) force arbitration to compromise amounts due, and (vii) engage in outright theft, including passing bad checks, as they perpetrate these frauds.

B. These check, mail, and wire frauds have been and are used by defendant UNITED STATES (principally defendants FBI, CIA, ARMY, USMS) to control Lead Plaintiff in

perpetual involuntary servitude and forced labor from majority age in what are supposedly the Lead Plaintiff's private enterprises owned and controlled by him, and while he has and does act and operate in "manager investor," "member" and/or "partner," roles. Co-investor, member, and partner roles have been persistently and surreptitiously filled by preselected undercover agents, officers, informants, and periodically by members of the media, as part of defendants' conspiracy, typically driven by defendant UNITED STATES, which has and does place its own and other police powers officers, agents, and confidential informants in these positions by systematically screening out all other options including in, without limitation, each and every one of Lead Plaintiff's numerous attempts from 1983 (Sheldon-Lee Associates, with THORPE, CIA, paragraphs 428, 563) to engage in untrammeled interstate commerce and commerce on federally funded projects in various entrepreneurial businesses, to wit:

- (i) 1990, Alliance for a stolen project account receivable payment of approximately \$165,000, ostensibly to Steve's Maintenance from the Bates Vocational-Technical Institute project in Tacoma, WA, with eventual recovery of about \$82,000, a loss of \$83,000, plus legal fees paid (paragraphs 445, 446),
- (ii) 1993, PAN, CORNWELL, Ron WILLIAMS, (UNITED STATES, FBI, CIA) as an employer PAN promised and then denied compensation by using the fraudulent subterfuge of accounts receivable factoring fraud, a loss of approximately \$65,000 to \$125,000 (paragraph 448, US Bankruptcy Court filing November 1993, Western Washington, Dennis and Jeanette Brewer),
- (iii) 2004, Allegent, LLC dba Performa for \$82,000 of bad checks passed to Performa by a customer, actually a defendant insider entity ShipNow (paragraphs 461, 462, 471(ii), 516, LPEE pages 10445-10471),

- (iv) 2004, Allegent, LLC, engaged CALDWELL (DOJ), while she fraudulently posed as an intellectual property attorney at Seed & Berry to pursue the ShipNow intellectual property matter for Allegent, while starving the Lead Plaintiff's LLC of financial resources, as Lead Plaintiff was working unwittingly with PRAY (UNITED STATES, USMS or FBI) as co-owner while accruing legal fees paid by Allegent to Seed & Berry (paragraphs 219, 275(i), 276, 320f(iv), 461, 462, 471(ii), 516), and,
- (v) 2019, defendant DEAN T. SMITH (UNITED STATES, FBI) filed litigation in the Eastern District of California (19-cv-01918, which see on Pacer.gov). The *Smith v. Winnett/Brewer* et al case in 19-cv-01918 was eventually voluntarily dismissed without prejudice in April 2021, is a clear abuse of the legal process by defendant UNITED STATES, FBI, DEAN T. SMITH (paragraphs 477, 626 RGTS-6, 658 RICO-20, Interline Exhibits 6, 11, LPEE pages 140 et al, 8472-8473, 9601-9604, 9610-9611, 9788-9790, 9925, 9926, 9997, 10004).
- D. Defendant UNITED STATES and its co-conspirators have never allowed any enterprise Lead Plaintiff has attempted to run to actually operate without disruption since coopting Sheldon-Lee Associates with partner and co-investor THORPE (defendant CIA) in 1983. Nor have defendants UNITED STATES and its co-conspirators allowed any further employment by the Lead Plaintiff since September 2002 except the human trafficked from imposed homelessness in Boston, MA 10 months of fraudulent employment in 2007-2008 at ESTABLISH by ROSENBERG and ROSS.
- E. Lead Plaintiff has been illegally human trafficked in involuntary servitude since 1968, and has been and is subject at all times from 1979 to the present, to involuntary servitude and forced labor while being human trafficked to various assigned employment "options" and to

immediate arbitrary termination on whim as determined by defendant UNITED STATES and co-conspirator defendants for their convenience. He was forced to accept the compensation the defendants indirectly specified using mail fraud, wire fraud, and their internal illegal intelligence operations and enterprises, as he was unable to access any authentic private employment opportunities, and his businesses have been and are repeatedly defrauded to failure using various means, including deprivation of SBA loans, guarantees, and bonding, and access to private investor financing and/or public investor markets.

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

Interline Exhibits:	6, 11
Complaint paragraphs:	219, 275(i), 276, 320f(iv), 428, 445, 446, 448, 461, 462,
	471(ii), 477, 490-516, 563, 626 RGTS-6, 650, 658 RICO-
	11, 20
Appendix 2 paragraphs:	1-017
LPEE Table 2 pages 12023-	2-0047, 2-0054, 2-0056, 2-0057, 2-0061, 2-0081, 2-0106, 2-
12120 paragraphs:	0110, 2-0111, 2-0113, 2-0114, 2-0115, 2-0150
LPEE pages (see technical note	140 et al, 566, 8291-8293, 8351-8352, 10445-10506
on page numbering at	
paragraph 230):	
Emails and documents by topic	Currently blocked by defendant UNITED STATES
and date, also located in LPEE:	

#### **Racketeering - Fraudulent Financings**

#### 651. RICO-13 Racketeering Violations: Money Laundering - Alliance Nominee Cash Bank Deposit 1990

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

B. 1990: As forensically reverse engineered, defendant UNITED STATES made an approximately \$80,000 cash bank deposit at a U.S. Bank, N.A. branch on 14th Street NW,

Auburn, WA in the middle of 1990, a few months after Lead Plaintiff purchased the assets of Steve's Maintenance. The physical cash deposit was made by Kerry Brewer (defendant FBI, no relation to Lead Plaintiff) using a paper barrel bag typically used for groceries, in the presence of Lead Plaintiff to an account supposedly intended to provide a cash deposit for the purpose of securing bid and performance bonding from a third party bonding company. Since the deposit exceeded the \$10,000 limit which then required a written disclosure to IRS, Lead Plaintiff signed the required IRS form for the cash deposit.

C. The funds were deposited in an account under the signatory control of Kerry Brewer, not Lead Plaintiff. The funds were removed the following day by Kerry Brewer. An in-person IRS inquiry which followed weeks later at the company's office was answered by Lead Plaintiff. No further IRS follow-up occurred. This was most probably an attempt by defendant FBI to attract the attention and interest of IRS.

D. This cash deposit was intended by Lead Plaintiff to partially replace Alliance's lack of SBA bonding (defendant FBI fraud in deprivation of government benefits, paragraph 649 RICO-11) through use of a private bonding company, so the company could regain required bonding capacity essential to bidding larger projects and thereby growing sales revenue and profits on its 30% to 35% gross margin business. Lead Plaintiff also intended the cash deposit would, by increasing future revenues, partially replace defendant FBI's theft of receivables from the Bates Vocational-Technical School project, which Steve and Kerry Brewer had undertaken to remove \$165,000 of Alliance company cash flow (defendant did cut the cash receipts by around \$80,000 in a "compromise" of the actual amount legally due to Alliance from that Bates Vocational-Technical School project, in another of defendant FBI's series of attempts to (a) accelerate the

demise of Alliance (paragraph 650 RICO-12) and (b) to destroy the Steve's Maintenance records which evidenced prior illegal general searches conducted by FBI through this cover company.

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

Interline Exhibits:	Not applicable
Complaint paragraphs:	445-449, 471, 626 RGTS-6, 644, 649, 650, 651, 653, 683
	RICO-6, 11, 12, 13, 15, 45; 474, 651-672 RICO-13-34
	generally
Appendix 2 paragraphs:	1-017
LPEE Table 2 pages 12023-	Not applicable
12120 paragraphs:	

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

## 652. RICO-14 Racketeering Violations: Factoring Frauds – Pacific Financial Services 1992-1993, PAN Environmental Services 1993-1994

A. As forensically reverse engineered, Alliance won the subcontract to M.A. Mortenson for asbestos abatement on the federally funded Sea-Tac Airport Concourse BCD expansion project. Typically the first contractor on site, Alliance's start date was deliberately delayed by defendant FBI as part of it program of involuntary servitude and control of Lead Plaintiff and its planned destruction of the records of its illegal search and surveillance operations in the environmental services industry in western Washington, during which it had used cover company Steve's Maintenance, whose assets and records had been purchased by Lead Plaintiff's company, Alliance, which had FBI as a secret investor using a former Rainier National Bank SVP as the straw investment conduit (David J. Carey, former SVP Commercial Lending - Rainier National Bank).

B. The Sea-Tac Airport project late start led to a dramatic acceleration of the asbestos abatement schedule to meet the overall project schedule. The company's 12-20 person crew had to be expanded to about 80 people practically overnight, severely straining cash flow due to the need to meet a much greater weekly payroll expense without sufficient cash reserves prior to the 45 day payment of project progress invoices by the general contractor. As FBI orchestrated this delay and acceleration of asbestos abatement work on the Sea-Tac Airport Concourse expansion project, the Lead Plaintiff contacted the performance bonding company to request financial

assistance, only to learn the Utah based insurance company had been seized by the Utah Insurance Commissioner.

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

D. The Lead Plaintiff then sought an expensive form of contract financing known as factoring, with typical effective interest payment in the 70% to 90% per annum range. Pacific Financial Services took over the payroll function but failed to pay employment taxes, attempting to lay this back on Lead Plaintiff (paragraph 448). An IRS agent visited Lead Plaintiff at home during his recovery from DVT which arose after a financing trip to London for PAN, who described the turnover to Pacific Financial Services of all payroll responsibilities early in the course of the accelerated project.

E. With the benefit of forensic reverse engineering and based upon pattern of practice, defendant FBI's clear intent was the financial wrecking of the company after it was sold into private hands (David Carey, "co-owner and investor," was then former Rainier National Bank SVP used by FBI as the intermediary for its investment of agency funds), for the purpose of destroying the evidence of their illegal surveillance of the environmental services businesses in western Washington, and to entangle Lead Plaintiff in liability for unpaid federal 941 payroll taxes.

F. When this fraudulent financing eventually failed in Vancouver, BC, Canada, the \$20,000 factoring loan turned in a few months into a loan default totaling \$65,000 which Lead

Plaintiff had personally guaranteed, and then into personal federal bankruptcy in November 1993 filing for Lead Plaintiff and his second wife Jeanette. Lead Plaintiff was working on a financing at PAN when his wife Jeanette informed him that Pacific Financial Services had secured a court order against community property which was being used to garnish her wages for this \$65,000 defaulted loan.

G. Soon after the fraudulent Vancouver VSE related financing (CORNWELL, BURNS, CIA, and FBI) failed and the PFS factoring loan then caused Lead Plaintiff's personal bankruptcy, FBI and CIA (CORNWELL, Ron Williams) ran a similar pattern of racketeering acts in southern California against Lead Plaintiff by allegedly factoring a large Pacific Remediation Services (PAN subsidiary) account receivable to a southern California factoring company, which factoring proceeds were then to be used to make catch salary payments to Lead Plaintiff who was working without compensation, The factoring loan never transpired, the contract payment funds were allegedly placed in First Interstate Bank to cover a loan to the factoring company by First Interstate Bank and no effort was made by CORNWELL or PAN to legally claim the funds as required under California law.

H. As forensically reverse engineered, this was actually merely a gratuitously cruel fraud on Lead Plaintiff, mocking the prior fraudulent and forced bankruptcy, as the factor operation and the receivable were a completely fabricated operation with no actual proceeds to factor and no authentic factoring company involved. Lead Plaintiff never received any compensation for his work PAN during 1993-1994 – a compensation fraud on the Lead Plaintiff is the forensically reverse engineered clear and transparent purpose of this associated-in-fact enterprise pattern of racketeering acts. Defendant ROSENBERG (FBI) then trafficked Lead Plaintiff to Pacific

Pipeline's Board of Directors as the PAN racketeering acts and conspiracy was being wound down.

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

Interline Exhibits:	Not applicable
Complaint paragraphs:	448; 474, 474, 651-672 RICO-13-34 generally
Appendix 2 paragraphs:	1-017
LPEE Table 2 pages 12023-	2-0055
12120 paragraphs:	
LPEE pages (see technical note	Not applicable
on page numbering at	
paragraph 230):	

Emails and documents by topic and date, also located in LPEE:

Not applicable

### 653. RICO-15 Racketeering Violations: Fraudulent Financial Services – Ex-CIA Northern Africa Case Officer 1992-1995 Alliance

A. 1992-1993: As forensically reverse engineered, as part of defendant UNITED STATES' intentional financial wrecking of Lead Plaintiff's company Alliance, which incorporated (i) fraudulent co-ownership and control through a nominee (David J. Carey as nominee, FBI, paragraphs 445-449, 649 RICO-11), (ii) fraudulent legal representation (HIBBS and Susan THORBROGGER, DOJ/FBI, both embedded at Short Cressman Burgess law firm, paragraphs 446; 626 RGTS-6, 649, 651, 653, 683 RICO-11, 13, 15, 45), (iii) fraudulent deprivation of government benefits (SBA bonding, paragraph 446, 471; 649, 653 RICO-11, 15), (iv) theft and compromise of receivables (Steve and Kerry Brewer, FBI, paragraphs 644, 650, 651 RICO-6, 12, 13), was then succeeded by (v) a Vancouver, B.C. fraudulent financing which failed (paragraph 653 RICO-15).

B. This sequence of fraudulent financing acts by defendant UNITED STATES which led to zero dollars of company financing but did require considerable time and expense by Lead Plaintiff and his company, Alliance, was initiated in 1992 by an alleged financial services broker, Gerald CORNWELL (formerly a commercial cover CIA officer who operated from Pasco, WA in northern Africa as proprietor of a center pivot irrigation installation company), claiming much needed investment funding was available from a "known reliable source" in Vancouver, B.C., Canada.

C. CORNWELL (former commercial cover CIA agent in north Africa) and FBI worked, unknown to Lead Plaintiff, with RCMP, Ralph Shearing (who ostensibly ran a Canadian mining geophysical sampling company based in Vancouver, BC, Canada), and Rory Godinho (barrister

in the Vancouver, BC area), and CSIS, John Young (international mining financier and mining engineer), to develop this fraudulent Vancouver, BC financing package through Shearing, which required a financial audit.

D. CPA reviewed financial statements for Alliance were required to obtain this alleged multi-million dollar financing. To accomplish this task, financial statement compilation was contracted to the "sister" of a former Deloitte Seattle co-worker of Lead Plaintiff, Phil Walter. This "sister" (UNITED STATES, most probably FBI), then walked away after several weeks of work, leaving the financial statement compilation incomplete after being paid for work to date. This led to protracted delays in financial statement preparation as the Lead Plaintiff was forced to spend days straightening out her mess instead of bidding projects to sustain Alliance's critically important sales and cash flow. The financial statement review process was then further dragged out by the local "accountants," a local firm which was actually another illegal cover spying operation (defendant FBI). This sequence caused weeks of delay and cost the company thousands of dollars out of pocket for accounting services.

E. When this fraudulent financing eventually failed in Vancouver, BC, Canada, the \$20,000 factoring loan from Pacific Financial Services, Bellevue, WA (a fraudulent factoring company run by Henry Wozow, probably FBI) was used to cover the financing fees, audit fees, and expenses. turned in a few months into a loan default totaling \$65,000 which Lead Plaintiff had personally guaranteed, and then into personal federal bankruptcy in December 1993 for Lead Plaintiff and his fraudulently orchestrated second wife Jeanette (defendant ARMY, active duty, coerced using deferred prosecution threat for sexual orientation within national security sphere of military regulations).

F. Alliance, which already lacked the SBA bid and performance bonding it was legally entitled to access as a small business (paragraph 649 RICO-11), was starved out of existence due to the lack of bonding, lack of financing, and the abrupt acceleration of the federally funded Sea-Tac International Airport B, C, D Concourse expansion project, (paragraph 652 RICO-14) which further exacerbated its cash flow problems and resultant cash flow from projects. This accomplished the dual purposes of (i) Lead Plaintiff's perpetuated involuntary servitude in the illegal BRMT bioweapon and bioweapon delivery system, rights violations, and associated-infact racketeering enterprise of the UNITED STATES, and (ii) resulted in the destruction of Steve's Maintenance and records of that illegal cover company, which had previously been illegally used in criminal investigations in the asbestos abatement marketplace in Washington state, in continued knowing violation of the *Fourth* Amendment by defendant UNITED STATES.

G. 1993-1994: CORNWELL (former CIA) later became CEO of P.A.N. Environmental Services (PAN), a SEC pink sheet company, which in 1994 also deprived Lead Plaintiff of compensation due through yet another fraudulent factoring fraud. This particular episode of the pattern of racketeering acts occurred while defendant UNITED STATES, unbeknownst to Lead Plaintiff, was using PAN as a platform for a cross border investigation of financial frauds involving US persons and the Vancouver Stock Exchange, its brokers, agents, and others, while entangling the unwitting Lead Plaintiff further into this international investigation, a theme defendant UNITED STATES (FBI, USMS, CIA) has and does use repeatedly (among other still worse patterns of acts at other subcounts) to deliberately ensnare, entangle, and attempt to entrap Lead Plaintiff in national security matters due to the lack of recourse for these color of law abuse criminal conspiracies against rights (18 U.S.C. § 241) by defendant UNITED STATES.

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

I. The promised CLL financing, actually simply an effort to engage MI-6 (Kurtanjek, CLL as his international Managing Director commercial cover for mining projects in Africa and elsewhere), MI-5 (UK's FBI equivalent), and the London Metropolitan Police (which included a five man Counterterror squad trot-by while he was alone in a 500 foot long construction tunnel at Heathrow Airport, and a hotel bill on his Copthorne Tara, Kensington, hotel room number which remained unpaid by CORNWELL for a time being sufficient to attract the attention of their Serious Fraud squad) with the Lead Plaintiff for technical surveillance (yet again, see the national security event Queen Elizabeth II's 1983 visit to Seattle, Queen Elizabeth II's 1983 visit to Seattle at paragraphs 211, 600 NSEC-1, 623B RGTS-3, 679B RICO-41 for a prior example) failed in Spring 1994. CORNWELL and FBI also ran a \$165,000 fraudulent factoring theft on a

Pacific Environmental Services (the P. in P.A.N.) sub-soil remediation or paving project during this sequence in 1994, echoing the prior \$20,000 factoring loan which had been used for the fraudulent Canadian financing, \$65,000 loan default, and forced bankruptcy closed out just four or five months before. Lead Plaintiff never received the compensation due for his work at PAN (paragraphs 450-453, 601 NSEC-2, 623 RGTS-3).

Interline Exhibits:	Not applicable
Complaint paragraphs:	211, 445-449, 450-453, 471; 600, 601 NSEC-1, 2; 623, 626
	RGTS-3, 6; 644, 649, 651, 652, 653, 679B. 683 RICO-6,
	11, 13, 14, 15, 41, 45; 474, 474, 651-672 RICO-13-34
	generally
Appendix 2 paragraphs:	1-017
LPEE Table 2 pages 12023-	2-0053 through 2-0055
12120 paragraphs:	
LPEE pages (see technical note	1 et al, 11-139, 140 et al, 383, 398, 420, 463, 566, 767-768
on page numbering at	
paragraph 230):	
Emails and documents by topic	Not applicable
and date, also located in LPEE:	

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

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

### 654. RICO-16 Racketeering Violations: Fraudulent Financial Services – Ex-CIA Latin America Case Officer 2013-2015

A. Charles JACKSON, (who has been represented by defendant Ray SULLIVAN as deceased since around December 2014) was a former Merrill Lynch Mexico City investment banker (CIA commercial cover, Latin America), was paid \$750 from Lead Plaintiff's personal funds and contracted by Winnett, owned by Lead Plaintiff, for investment banking services. These services were fraudulently provided in bad faith with numerous discussions and emails including fraudulent progress reports of investor interest over several used to create the appearance of progress, fraudulently freeze the Lead Plaintiff form engaging services, and perpetuate the involuntary servitude of Lead Plaintiff beginning in March 2013 (paragraphs 543, 661D, 684A RICO-23, 46). In September 2014, Lead Plaintiff expended an additional \$700 of personal funds (loaned by JACKSON and repaid to his supposed widow after his alleged death) for travel to a Phoenix, AZ area investor development meeting with JACKSON, his supposed spouse Gail (identified as former Attorney General Janet Reno in April 2024 photo identification by Lead Plaintiff and the sister of Charles), and John Tyler, Cherry Creek Partners, a supposed major investor, as well as to tour potential organic farming sites with Jack Doughty, Three Rivers Ag, a real estate broker.

B. JACKSON's alleged investor and lender interactions and interests described and discussed with Lead Plaintiff during this period during this period included Prudential Agricultural Lenders; Prince Zayid Mohammed, a Middle Eastern investor; Skye Root, WGIM agriculture investment advisory firm for TIAA-CREF; an elderly Mississippi investor, Jack Burstein, a Florida investor; Lawrence Financial; John Tyler, Cherry Creek Partners; RABO VanDeGraaf (actually the then recently returned CIA Moscow station chief); Sherbrooke Capital; Byron Lekulvich, Resource Land Holdings, Colorado Springs, CO, among others. All elements of this fraud and swindle were completely fraudulent representations made by JACKSON and others herein both in person and using emails and phone calls. No investment funds were raised nor intended to be raised in this fraudulent deprivation of honest services. Defendants DOJ and CIA intended this solely as internal security backcheck and to defraud the Lead Plaintiff in interstate commerce by depriving him of those rights to sustain involuntary servitude as human subject of illegal biomedical experiments without consent service of the illegal BRMT bioweapon and bioweapon delivery system and to determine their own security of senior government officials who had operated in and as executives of those defendants in this associated-in-fact racketeering enterprise and conspiracy against rights.

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

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

Interline Exhibits:	4 through 14
Complaint paragraphs:	543, 661D, 684A RICO-23, 46; 474, 474, 651-672 RICO-
	13-34 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-	2-0171
12120 paragraphs:	
LPEE pages (see technical note	383-384, 431, 440, 8370-8373, 8378, 8411, 9902, 9905,
on page numbering at	9923, LPEEV65-6, 7
paragraph 230):	
Emails and documents by topic	Charles JACKSON Resume 130311.pdf
and date, also located in LPEE:	JACKSON Contract 140207.pdf
	JACKSON Initial Contact 130311,
	JACKSON ibanker deal agreed 130809,
	JACKSON retainer pymt 130903,
	JACKSON fee from BA personal acct130926.pdf
	JACKSON re BLACKPOOL Term Sheet and BP fail
	131015,
	JACKSON intro to SULLIVAN 131125,
	JACKSON re Alberts Organics as customer 140114,
	JACKSON investor status inquiry 140115,
	JACKSON re new cust 2 3 140115,
	JACKSON reply on investor questions 140128,
	JACKSON Hurwitz on 25MM loan 140206,
	JACKSON Hurwitz verbal Relay 140206,
	JACKSON Pru Ag REED Mitchell referral 140207,
	JACKSON REED Mitch Pru Ag Loans self intro 140207,

JACKSON on Alberts contract update 140218, JACKSON re 140226 SULLIVAN mtg Ramsey 140219, JACKSON re SULLIVAN face mtg 140219, JACKSON Domeier Prudential Ag referral 140224, JACKSON re Zayid alleged investment 140303, JACKSON re Attorney retainer wire on Zayid deal 140304, JACKSON re Zayid Attny Retainer Xfr 140304, JACKSON re Burstein call FL 140307, JACKSON re Sherbrooke Capital 140404, JACKSON connects Skye Root 140407, JACKSON re circular referral to Resource Land Byron Lekulvich 140627, JACKSON re Tyler 140629, JACKSON re Tyler Eager to Raise 200MM 140701, JACKSON Contract 140707, JACKSON re 55% MS investor 140827, JACKSON on 3 London closings 140902, JACKSON re 3 London Closings 140902, JACKSON re Tyler Doughty Maricopa County mtg 140909, JACKSON Maricopa County Visit Details 140917, JACKSON re PHX trip 141101 Tyler mtg 140917, JACKSON re personal BofA acct number 141015, JACKSON VanDeGraaf likely Maricopa Rabo poser 141024, JACKSON 700 for Maricopa trip 141027, JACKSON VanDeGraaf likely Maricopa Rabo poser 141027. JACKSON re Burstein Miami update 141204, JACKSON re Burstein mtg and Hain 141210, JACKSON re Hain Celestial interest 141210, JACKSON Gail on Charles Death 150209, JACKSON Tyler re PPM review by SULLIVAN 150806, Westchester Mgmt Skye Root re farm acq parameters 140407 Zayid 20MM Cancelled Signed Subscription Agreement Cancelled 121002.pdf Zayid Signed JV Agreement121022.pdf

## 655. RICO-17 Racketeering Violations: Fraudulent Financings and Loans - NYC Broker/Investor 2011-2017

A. Defendant Jonathan CROSS (UNITED STATES, FBI), represented himself as an officer or principal of various entities using the various defendant entities sharing the names

BLACKPOOL and SHEFFORD, while acting as a defendant agent, officer, and as a part of this on-going conspiracy (paragraph 692B RICO-54). CROSS represented his firms, these various BLACKPOOL and SHEFFORD entities legally named in the caption of this Complaint, as capable of and sincerely interested in securing financing on behalf of Lead Plaintiff's entities, thereby conspiring with and playing an on-going role from approximately 2011 to 2017 in a complex evolving sales, production, operations, and financing scheme to deprive Lead Plaintiff and his related entities of investment and authentic opportunities to engage in interstate commerce.

B. CROSS proposed various fraudulent financings, bridge loans, held imaginary

Investment Committee meetings, traveled to Las Vegas on February 8, 2017, and caused the

Lead Plaintiff to do so as well, while misrepresenting himself as having TIAA-CREF as a coinvestor interested in investments in the tens of millions of dollars in Winnett entities owned and
controlled by Lead Plaintiff as the parties toured Stockton Hill Farm north of Kingman, AZ with

VOLK (FBI). Lead Plaintiff also negotiated with Robert Saul, representing Barings, the
institutional investor manager/owner, for the 16,000 acre irrigated Stockton Hill Farm
acquisition, as he was being assisted in preparation of purchase proposals by Bill REED (FBI
Tucson). He was introduced to James Rhodes, a Las Vegas real estate developer being
investigated for bank fraud by defendant FBI (introduction by Steve POINDEXTER, FBI) who
owned Kingman Farms (first together with and then as a farm which was split from Barings'
Stockton Hill Farm) during the course of this sequence of defendant FBI fraudulent interferences
in interstate commerce. Robert Saul later appeared again in this defendant FBI scheme as a
Massachusetts-based member of the Fiera Comox team, a Montreal, Quebec, Canada

institutional investor, where Lead Plaintiff held investment discussions by email and phone with another team member in the series of fraudulent financings led by defendant FBI.

C. This overall pattern is yet another in the decades-long sequences of FBI institutional racketeering acts interferences in interstate commerce across multiple field offices (most probably Phoenix, Tucson, Las Vegas, Manhattan, and/or Miami), to sustain illegal BRMT development, rights, and racketeering acts, violations, and injuries against Lead Plaintiff. This pattern of practice is representative of the type and manner of acts, injuries, and violations against this class of plaintiffs by defendant UNITED STATES in its broad institutional pattern of violations of constitutional rights, primarily by DOJ, its police powers operations, ARMY, other military services operating contrary to posse comitatus legal constraints on operations against US persons, and CIA/ARMY illegal development and deployment of the illegal and internationally BRMT bioweapon and bioweapon delivery system.

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

Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626

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

Interline Exhibits:	4 through 14
Complaint paragraphs:	692B RICO-54; 474, 474, 651-672 RICO-13-34 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-	2-0039, 2-0047, 2-0053, 2-0054, 2-0059, 2-0171, 2-0173,
12120 paragraphs:	2-0179
LPEE pages (see technical note	8454-8467, 8939-8955, 9053-9059, 10138-10156, 10528-
on page numbering at	10565, 10566-10613, LPEEV65-6, 7
paragraph 230):	DI ACKROOL E' AIK 11001
Emails and documents by topic	BLACKPOOL First Hit 110815,
and date, also located in LPEE:	BLACKPOOL IC Approval 120919,
	BLACKPOOL deel Podzemny to Dalhart Realty130201,
	BLACKPOOL CROSS early hook 140120,
	BLACKPOOL Persists Example 150707,
	BLACKPOOL IC Approval 150821,
	BLACKPOOL on PHX trip 150825,
	BLACKPOOL Persists Example 151103,
	BLACKPOOL merge annount 161101,
	BLACKPOOL PPM process 161122,
	BLACKPOOL 1MM Bridge Loan Contract 161129,
	BLACKPOOL WF wire advice 161130,
	BLACKPOOL Term Sheet proposal email Smith
	PETERSEN 170126,
	BLACKPOOL re TIAA-CREF (Skye Root JACKSON
	tieback poss) 170131,
	BLACKPOOL email Term Sheet Signed 170201,
	BLACKPOOL re other investors rejected 170201,
	BLACKPOOL tour Stekton Hill Farm LV realtor contact
	170202,
	BLACKPOOL re Stekton Hill Broadway VOLK
	connection 170203,
	BLACKPOOL Stockton Hill tpour fup 170210,
	BLACKPOOL Stockton Hill dataroom access 170213,
	BLACKPOOL Stockton Hill offer status 170214,
	BLACKPOOL SAUL Barings Stockton Hill LOI 170215,

BLACKPOOL Stockton Hills Farm Tour Final Logistics 170217, BLACKPOOL re Stockton Hill SAUL Barings LOI response 170221, BLACKPOOL re delay 170225, BLACKPOOL xmit detail financial info 170227, BLACKPOOL re investment to date 170228, BLACKPOOL to fund fup 170301, BLACKPOOL re SAUL Barings Deadline Stockton Hill 170303, BLACKPOOL stringout 60MM financing 170303, BLACKPOOL Cmte Mtg 170307, BLACKPOOL re possible loss Stockton Hill Farm 170307, BLACKPOOL more questions string out 170308, BLACKPOOL stringout 60MM financing 170308, BLACKPOOL recvs CFO Smith resume during IC mtg 170308, BLACKPOOL re DB personal bkgrnd 170310, BLACKPOOL re former counsel Seattle 170310, BLACKPOOL to request firm commit on 60MM 170310, DD Callahan (KEENE) on BLACKPOOL funding 170202, DD Callahan (KEENE) re BLACKPOOL Term Sheet 170202. DD Callahan (KEENE) update BLACKPOOL 170227

# 656. RICO-18 Racketeering Violations: BRMT Assisted Check Fraud Entrapment Attempt – Top US Financial Institution 2014-2015

A. In June 2015, defendant FBI executed a complex interstate and international funding fraud across five weeks which FBI had first set up in May 2014 (first contact). A \$10 million financing commitment was made by email. This fraud and swindle used the illegal BRMT bioweapon and bioweapon delivery system and check fraud to cause fraudulent checks to be deposited in the Winnett corporate account by mailing a check to the Lead Plaintiff (\$9,826 as deposited) and by an agent of defendant UNITED STATES (unknown FBI, Manhattan) who used the Lead Plaintiff's identity and live automated teller assistance at an ATM in New York City (\$26,430 as deposited). Lead Plaintiff transferred \$9,125 to a third party. Both deposits

from two different parties are dishonored, and the business account was overdrafted by \$9,118, as a result of the \$9,125 wire transfer to the third party above. The Ramsey, NJ Bank of America branch where these accounts were serviced was closed for the day as Lead Plaintiff received this emailed notice of dishonor, so he called Bank of America's customer service line. He was unable to reach live customer assistance despite several long periods on hold. This inability to reach a responsive customer service agent was a new experience which later became quite familiar to the Lead Plaintiff over the next 15 years into 2022. Similar property theft abuses just under the \$10,000 reporting limit which also constitute racketeering acts in deprivation of property rights by defendant UNITED STATES include paragraphs 610I HEXP-7, 661 RICO-23, 830D, 831G, and an international \$5,000 reporting limit at paragraph 665.

B. Lead Plaintiff received a check drawn on a Canadian company and addressed to him personally around this same time, deposited this check and received an overdraft notice mailed on July 7, 2015 for \$180,000 against his personal account several days later.

C. These Bank of America accounts were closed by the "bank" (most probably controlled by an FBI embed, or less likely SECRET SERVICE, LPEEV65-6, 7) soon thereafter. The Ramsey, NJ branch refused to accept a cashier's check made out to Bank of America from Wells Fargo, forcing the Lead Plaintiff to transport about \$9,200 in cash between the two bank's branches in Ramsey, NJ.to pay off the overdraft and fees on the closed account (the requirement to use cash sustained untraceability/concealment of evidence of this FBI perpetrated crime sequence which was just under the \$10,000 disclosure limit).

D. Bank of America (actually a shadow version controlled by defendant UNITED STATES, LPEEV65-6, 7) then closed both accounts. Since these accounts were opened immediately after Lead Plaintiff was human trafficked by ROSENBERG to ESTABLISH, Fort

Lee, NJ, the first practical effect was to conceal and later destroy evidence of (i) the fraudulent employment at ESTABLISH and related compensation theft (ROSENBERG, ROSS, FBI, USMS); (ii) the fraudulent relationship with MODDERMAN; and (iii) related costs and expenses, and theft of labor, materials, and project overhead for Cliffside Park, NJ apartment renovations by CHALOM (USMS); (iv) the human trafficking sequence incorporating the Newark federal District Court filing, loss of residence less than 120 days later (initiated by CHALOM); (v) involuntary commitment in Paramus, NJ hospital, (vi) subsequent trafficking, after Lead Plaintiff's "voluntary" dismissal of the Newark federal case under duress and coercion, to Ramsey, NJ; and (vii) the privations related thereto between August 2007 and August 2015. The "bank" telephone legal department representative later informed Lead Plaintiff, the bank would not preserve banking records as required by his evidence preservation letter (LPEEV65-7) sent to the bank address as it was not a named defendant in the litigation, and Lead Plaintiff had no online access to retrieve these records.

E. <u>The second practical effect</u> was defendant UNITED STATES' use of an illegal BRMT bioweapon and bioweapon delivery system brain hijacking to manipulate Lead Plaintiff's mental process to high trust (which is totally consistent with his life experience throughout his childhood within the highly ethical Quaker sect religious group he was raised in) for this sequence of judgement errors he rarely made otherwise, as a test of illegal BRMT brain hijacking progress, which was then repeated with Laura Akoto using this same method and adding illegal BRMT bioweapon and bioweapon delivery system hijacking of oxytocin, at paragraph 612 HEXP-9.

F. This sequence of defendant UNITED STATES racketeering acts was another in the sequence of patterns of multi-layered entrapment attempts. This sequence was set up by first

contact in May 2014, implemented in June-July 2015, and acted to destroy evidence (by passage of time) of the financial crimes undertaken at ESTABLISH (paragraph 643 RICO-5) and by CHALOM (paragraph 642 RICO-4). This Bank of America sequence was a modified and more predatory reprise of Lead Plaintiff's experience with "Washington Mutual Savings Bank," and his complete inability to understand their method of balance calculation during the 1980s and 1990s, despite being a Certified Public Accountant licensed in Washington state during the 1980s. This difference between his checking account balance as calculated (paper checks were still quite common at this time) by him and by the "Bank" leads to literally thousands of dollars of \$25/\$35 overdraft fees being illegally drains from his account for NSF fees over several years. This repetitive pattern of strong circumstantial evidence leads Lead Plaintiff to believe his finances were then the subject of direct government control by defendant UNITED STATES and have been for decades, comprising additional thousands of color of law RICO and Fourth Amendment violations by defendant UNITED STATES and its co-conspirators.

G. This is yet more evidence, which Lead Plaintiff has reverse engineered years later in preparation of this complaint, indicative of defendant UNITED STATES' massive, sustained and targeted efforts to cause and create circumstances of non-payment of this overdraft to the "Bank," thereby exposing the Lead Plaintiff to potential criminal liability - another instance of an on-going series of nearly perpetual entrapment attempts across his personal and professional life while effecting the destruction of records of its specific culpability for these acts, violations, and injuries. Systematic interferences in Lead Plaintiff's telephonic and electronic communication have and do continue at all times, completely disrupting legal and constitutional rights and legal protections in interstate commerce, and are incorporated in defendant UNITED STATES' complete, total, and direct control of Lead Plaintiff's life circumstances in systematic

violation of constitutional rights, and are representative of comparable acts, violations, and injuries to other members of this class of plaintiffs.

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

Interline Exhibits:	Not applicable
Complaint paragraphs:	612 HEXP-9; 642, 643 RICO-4, 5; 474, 474, 651-672
	RICO-13-34 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-	Not applicable
12120 paragraphs:	

LPEE pages (see technical note on page numbering at paragraph 230):	1686, 1699-1700, LPEEV65-6, 7
Emails and documents by topic	Tissiman first hit 140519,
and date, also located in LPEE:	Wells Oliver Tissiman 419pm acct info150612,
	Wells Oliver Tissiman 654pm 150612,
	Wells Oliver Tissiman 150613,
	Wells Oliver Tissiman 2015 150615,
	Wells Oliver Tissiman 1 655am 150616,
	Wells Oliver Tissiman 2 713am 150616,
	Wells Oliver Tissiman 3 141110 to 1120am 150616,
	Wells Oliver Tissiman 3 BA Deposit Slip 1120am 150616,
	Wells Oliver Tissiman 4 439pm 150616,
	Wells Oliver Tissiman 5 619am 150617,
	Wells Oliver Tissiman 6 818am 150617,
	Wells Oliver Tissiman 7 1207pm act fast on 150617,
	Wells Oliver Tissiman 8 105pm 150617,
	Wells Oliver Tissiman 9 343pm 150617,
	Wells Oliver Tissiman 9190 150622,
	Wells Oliver Tissiman 150616R BA 180K NSF 150707,
	Wells Oliver Tissiman P BA 180K NSF 150707,
	Wells Oliver Tissiman Q re bank fraud 150715

## 657. RICO-19 Racketeering Violations: False Personation – NYC Forbes 200 Captive Corporate Investment Firm 2013-2017

A. Defendant Daniel WEINER, a practicing attorney in New York City, engaged in false personation, fraudulently misrepresenting himself as a defendant ARLON GROUP employee to further the defendants' overall scheme of fraudulent interferences in interstate commerce, thereby coordinating with and playing an on-going role from 2013 in a complex scheme of racketeering acts integrating sales, production, operations, and financing frauds and misrepresentations to deprive Lead Plaintiff and his related entities of authentic opportunities to engage interstate commerce. This scheme requires and consumes the time and financial resources of Lead Plaintiff and his business entities in the bad faith perpetuation of defendants' long-running schemes, frauds, swindles, and pattern of racketeering acts. See LPEE pages 386, 3938.

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

Interline Exhibits:	Not applicable
Complaint paragraphs:	170; 474, 474, 651-672 RICO-13-34 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-	2-0039, 2-0047, 2-0053, 2-0054, 2-0059, 2-0171, 2-0173,
12120 paragraphs:	2-0179
LPEE pages (see technical note	386, 3938
on page numbering at	
paragraph 230):	
Emails and documents by topic	Arlon WEINER intial hit 130202,
and date, also located in LPEE:	Arlon update to WO team 130203,
	Arlon Declines 130207,
	Arlon WEINER reprise 170510,

Arlon Webel DD Callahan (KEENE) phone call set 170530, Arlon Webel from WEINER 170530, Arlon Danl WEINER 170826,
WEINER Arlon 130202

### 658. RICO-20 Racketeering Violations: Fraudulent Investor Personation - Investments and Loans 2015-2019

A. Defendant DEAN T. SMITH (defendant FBI, most probably Sacramento field office) responded to an online EquityNet.com (website whose electronic communications are captive to defendant UNITED STATES intercepts and interventions) solicitation of accredited investors and made an initial investment of \$100,000 in August 2015 (FBI funds), then made a series of additional investments and loans from allegedly personal funds, trusts, and entities. These funds were used to perpetuate this four year episode of involuntary servitude from August 2015 to September 2019, adding still more years to defendants' perpetual string out and involuntary servitude by defendant UNITED STATES and its co-conspirators as they blocked Winnett, its subsidiaries, and Lead Plaintiff from actual, legitimate interstate commerce activities, primarily using (i) electronic frauds including, without limitation, wire fraud, email fraud, computer access device fraud; and (ii) other color of law abuses of police powers operations in, without limitation, Pima, Maricopa, and Mohave Counties and other locations in Arizona, in New York state including in New York City, and in New Jersey, Nebraska, Arkansas, Missouri, and Washington state, as well as (iii) international co-conspirators such as externally based CIA personnel and friendly foreign intelligence services, and (iv) explicitly screened-in domestic and international bad actors.

B. In total, FBI expended approximately \$200,000 of agency funds which were secretly invested in Winnett in their 2015-2109 entrapment attempt series against Lead Plaintiff led by

"investors" DEAN T. SMITH, Auburn, CA and DOUG PETERSEN, Brookline, NH. These FBI funds were then effectively recycled through other undercover entities including, without limitation, ADAMSON BROTHERS, I-BANK ATTORNEYS, SULLIVAN, INSIGHT NETWORK, PPM EXPERTS, CORNHUSKER CAPITAL as well as individual defendants including, without limitation, FBI's NICKLESS, CASTRO, PAUL SMITH, BLITCH, WASEMAN, LEBLOND, (all Winnett embedded FBI fraudulent officers and employees), DOJ/FBI Daniel KREWSON (MULTIFUNDING) as they engaged in bad faith acts interfering with interstate commerce.

C. Fraudulently placed employees and legal counsel also personally took stock options in various Lead Plaintiff owned and controlled private businesses for future benefit:

Grantee	Date	Shares	Pric	ce	<b>Grant Number</b>
Winnett Perico:					
P Smith	Sep 30 2015	200,000	\$	5.50	G150930-1
M Castro	Sep 30 2015	200,000	\$	5.50	G150930-2
P LeBlond	Sep 30 2015	200,000	\$	5.50	G159015-3
J Waseman	Dec 1 2015	40,000	\$	5.50	G151201-1
R Gomez	Dec 1 2015	40,000	\$	5.50	G151201-2
D Mota	Dec 1 2015	40,000	\$	5.50	G151201-3
R Sullivan	Dec 1 2015	40,000	\$	5.50	G151201-4
G Crossgrove	Dec 1 2015	40,000	\$	5.50	G151201-5
R Foland	Jan 14 2016	40,000	\$	5.50	G160114-1
M Vindiola	Jan 14 2016	40,000	\$	5.50	G160114-2
B Blitch	Jan 14 2016	40,000	\$	5.50	G160114-3
B Reed	Jan 15 2017	40,000	\$	5.50	G170115-1
R Wood	Jan 17 2017	40,000	\$	5.50	G170117-1
Sheldon Beef:					
C Canchola	Feb 25 2020	7,750	\$	0.01	200225-1
J Nickless	Feb 25 2020	7,750	\$	0.01	200225-2
J Waseman	Feb 25 2020	7,750	\$	0.01	200225-3

D. PAUL SMITH (FBI undercover name of unknown agent) also persisted in attempting to secure back-dated stock options to be signed off by Lead Plaintiff during his fraudulent tenure

as incoming CFO of Winnett, as he engaged in protracted delays and harassment throughout his preparations of financial projections, consistent with FBI tradecraft and interferences with interstate commerce as forensically reverse engineered.

E. These funds were being expended in good faith by Lead Plaintiff intending to raise additional funds and accomplish interstate commerce including, without limitation, to fulfill sales orders and prospective sales contracts from corporate entities including, without limitation, Albert's Organics, Albertsons, WALMART, KROGER and, COSTCO through Bridge's Produce, Portland, OR. This sequence also inculpated defendant ARPAIO (Interline Exhibit 5) in various acts, violations, and injuries in interstate commerce as he posed as Greg Crossgrove, a produce industry and organic production consultant.

F. These FBI agency funds were expended in interstate commerce to perpetuate involuntary servitude to sustain constitutional rights violations against Lead Plaintiff in defendant UNITED STATES' illegal BRMT bioweapon and bioweapon system development and deployment, civil and constitutional rights violations, and pattern racketeering acts sustained by the co-conspirator associated-in-fact enterprise from inception.

G. In 2019, defendant DEAN T. SMITH (UNITED STATES, FBI Sacramento) filed litigation in the Eastern District of California (19-cv-01918, which see on Pacer.gov) which further extended Lead Plaintiff's involuntary servitude and functionally destroyed the interstate commerce startup Winnett and its subsidiaries, as described herein at Interline Exhibits 6, 11, paragraph 626 RGTS-6.

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

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

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

Interline Exhibits:	6 specifically, 4 through 14
Complaint paragraphs:	626 RGTS-6; 474, 474, 651-672 RICO-13-34 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-	Entirety of column entitled Actions: Destroy Career,
12120 paragraphs:	Businesses; Pretext, Entrap, Incriminate from 2-0165
	through 2-0187
LPEE pages (see technical note	140 et al, 380, 382, 430, 8472-8473, 9642, 9645, 9646-
on page numbering at	9647, 9907, 9925, 9926, 9997, 10004, 10157, 10164,
paragraph 230):	10165-10171
Emails and documents by topic	Shareholder Info D Smith Address Preferred Trust
and date, also located in LPEE:	150821.pdf
	Smith adds investment 160326,
	Smith 5K View Wire Transfer Detail - U.S 170126,
	Smith Active Air Freight LLC USbank wire 1000 170315,
	Smith adds 1000 170315,
	Smith avail escrow funds 170531,
	Smith VP Fin intvw and connect DSmithPDX 150826,
	Smith on expenses Vindiola 160114,

Smith on BA pers acct scam wire xfrs 160125,

Smith on Jabor wire fee scam 160125,

Smith on potential financing network intro 160217,

Smith on development costs per acre 160406,

Smith sales intro call in AZ 160704,

Smith re Oliver Term Sheet 160707,

Smith re fine tuning on Oliver financial proposal 160720,

Smith re IT traceability budget add Oliver Hyder 160731,

Smith re Status Report Detail on Hyder Oliver et al 160818,

Smith Triple Fresh Contact on Sales Prospects 160907,

Smith status 160908,

Smith Triple Fresh passes setback on sales 160915,

Smith re WMT prior sales agents failures 161011,

Smith re continuation 161012,

Smith re 2500 add 161022,

Smith re avocdos sales hook and PACA 161102,

Smith re Blockpool Funding 170202,

Smith re backup plan 170322,

Smith re SHEFFORD Active Air Frt LLC 170322,

Smith re collateral support for loan 170323,

Smith re prior lost orders and funding level 170427,

Smith re investor lead development 170504,

Smith re trip 170506,

Smith worried 170510,

Smith escrow lender fail 170603,

Smith complains 170712,

Smith referred investor 170719,

Smith re WMT 170811,

Smith on 7500 loan and cattle rotation 170914,

Smith re 7500 loan and cattle rotation 170914,

Smith update WMT ND investor 171106

Smith 100K Check 1of2 150730.pdf Smith 100K Check

200f2 150730.pdf

Smith 100K Subscription Agreement

SKMBT\_C36415072911310 DB Signed 150729.pdf

Smith Litigation Halt Proposal to resume company

operations 200106.pdf

Smith Litigation SULLIVAN Winnett - WCC Letter

Respond to Evers-DSmith 190621.pdf

Smith Litigation SULLIVAN Winnett - WCC Letter to

Evers - Dean Smith III 190723.pdf

Smith Litigation Winnett - WCC Letter Responding to

Evers - Dean Smith II 190710.pdf

Smith Note 5K 190201.pdf

Smith Loan pays CORNHUSKER Retainer 10125

Smith \$30K Loan 10157

#### 659. RICO-21 Racketeering Violations: Fraudulent Investor Personation and Investments 2015-2020

A. Defendant Doug PETERSEN (FBI embedded as CEO of Worker's Credit Union, resident of New Hampshire) responded to an online EquityNet (website, whether spoofed or actual, whose electronic communications were and/or captive to defendant UNITED STATES intercepts and interventions as to Lead Plaintiff) solicitation of accredited investors and invested \$25,000 in 2015, plus additional funds over following years, from personal funds and retirement trusts. These funds were used to perpetuate this four year episode of involuntary servitude from August 2015 to September 2019, adding still more years to defendants' perpetual string out and involuntary servitude by defendant UNITED STATES and its co-conspirators as they blocked Winnett, its subsidiaries, and Lead Plaintiff from actual, legitimate interstate commerce activities, primarily using (i) electronic frauds including, without limitation, wire fraud, email fraud, computer access device fraud; and (ii) other color of law abuses of police powers operations in, without limitation, Pima, Maricopa, and Mohave Counties and other locations in Arizona, in New York state including in New York City, and in New Jersey, Nebraska, Arkansas, Missouri, and Washington state, as well as (iii) international co-conspirators such as externally based CIA personnel and friendly foreign intelligence services, and (iv) explicitly screened-in domestic and international bad actors.

B. In total, defendant FBI expended approximately \$200,000 of agency funds which were secretly invested in Winnett in their 2015-2019 entrapment attempt series against Lead Plaintiff led by "investors" DEAN T. SMITH, Auburn, CA and DOUG PETERSEN, Brookline, NH. These FBI funds were then effectively recycled through other undercover entities including,

without limitation, ADAMSON BROTHERS, I-BANK ATTORNEYS, SULLIVAN, INSIGHT NETWORK, PPM EXPERTS, CORNHUSKER CAPITAL, as well as individual defendants including, without limitation, FBI's NICKLESS, CASTRO, PAUL SMITH, BLITCH, WASEMAN, LEBLOND, (all Winnett embedded FBI fraudulent officers and employees), DOJ/FBI Daniel KREWSON (MULTIFUNDING), as they engaged in bad faith acts interfering with interstate commerce (paragraphs 471-489, Interline Exhibits 4-12).

C. These funds were being expended in good faith by Lead Plaintiff intending to raise additional funds and accomplish interstate commerce including, without limitation, to fulfill sales orders and prospective sales contracts from corporate entities including, without limitation, Albert's Organics, Albertsons, WALMART, KROGER, and COSTCO through Bridge's Produce, Portland, OR. This sequence also inculpated defendant ARPAIO (Interline Exhibit 5) in various acts, violations, and injuries in interstate commerce as he posed as Greg Crossgrove, a produce industry and organic production consultant (paragraph 645 RICO-47).

D. These defendant FBI agency funds were expended in interstate commerce to perpetuate involuntary servitude to sustain constitutional rights violations against Lead Plaintiff in defendant UNITED STATES' illegal BRMT bioweapon and bioweapon system development and deployment, civil and constitutional rights violations, and pattern racketeering acts sustained by the co-conspirator associated-in-fact enterprise from inception.

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

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

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

Interline Exhibits:	4 through 14
Complaint paragraphs:	471-489, 645 RICO-47; 474, 474, 651-672 RICO-13-34
	generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-	2-0039, 2-0047, 2-0053, 2-0054, 2-0059, 2-0171, 2-0173, 2-
12120 paragraphs:	0179, column entitled Actions: Destroy Career, Businesses;
	Pretext, Entrap, Incriminate from 2-0165 through 2-0187
LPEE pages (see technical note	9653, 9917, 9923
on page numbering at	
paragraph 230):	
Emails and documents by topic	PETERSEN Stock Cert Issued 150927,
and date, also located in LPEE:	PETERSEN Status comments 160107,
	PETERSEN adds 2500 170102,
	PETERSEN re backup financing plans 170315,
	PETERSEN stock for cash infusion 170420,
	PETERSEN adds 2500 170516,
	PETERSEN re investor options 170516,
	PETERSEN stock cert 170519,
	PETERSEN FL agent on funds xfr 170913,
	PETERSEN FL agent stock cert 170914,
	PETERSEN re WMT China 171016,
	PETERSEN extends 171024,

PETERSEN re funding next steps WMT 180301, PETERSEN re WMT China 180301 PETERSEN Midland Completed New Asset Information Document.5.10.17 170510.pdf 150831 PETERSEN 25K Inv Check 150831.pdf 150927 WP Stock Cert 004 Preferred Series A Doug PETERSEN 150927.pdf 160404 WP Stock Cert 007 Preferred Series A Doug PETERSEN 160404.pdf 170103 WP Stock Cert 009 Preferred Series A Doug PETERSEN 170103.pdf 170420 WP Stock Cert 010 Preferred Series A Doug PETERSEN 170420.pdf 170519 WP Stock Cert 011 Preferred Series A Doug PETERSEN 170519.pdf 170708 WP Stock Cert 012 Preferred Series A Doug PETERSEN 170708.pdf 170914 WP Stock Cert 014 Preferred Series A Doug PETERSEN 170914.pdf 180305 WP Stock Cert 015 Preferred Series A Doug **PETERSEN** 200225 SBI 006 PETERSEN Stock Cert Common 200225.pdf

#### 660. RICO-22 Racketeering Violations: Fraudulent Financings – Private Placement and Public IPO 2015-2017

A. Defendant ADAMSON Brothers (with defendant Andrew ALTAHAWI as CEO, FBI Newark, NJ) primarily operating from Paramus, NJ, offered investment banking services to Winnett, including a \$22 million private placement shown at Interline Exhibit 7, to be followed by a public offering using an SEC S-1 registration statement to provide those investors with future liquidity, the classic financing SEC public process legitimately used by private companies when investment market conditions are favorable.

B. Winnett expended \$40,000 with ADAMSON of invested funds from DEAN T. SMITH (FBI, Sacramento) for this fraudulent private placement (Interline Exhibit 7, LPEE pages 8507-8514, 8524-8654, 8565-8626, zero dollars raised from the investors) and for legal

fees to defendant I-BANK ATTORNEYS of Illinois to prepare the SEC Form S-1 public stock offering registration statement for the promised public offering which was to follow for Lead Plaintiff's company, Winnett. The alleged interstate private placement raised zero dollars after an extended delay, consistent with both prior and subsequent experience in other defendant UNITED STATES racketeering interferences in interstate commerce from 1983, and which would be experienced by Lead Plaintiff again through a small but highly prestigious old line Wall Street brokerage and investment banking firm in 2017, DOMINICK (KEENE, GROSS) including, without limitation, in conspiracy with other members of this associated-in-fact enterprise with police powers operations at WALMART (Bentonville, AR. MCCORMICK, among others) and KROGER (Blue Vine, OH, KREMPEL, MERCED), (paragraphs 471-489, Interline Exhibits 4-12).

C. During the preparation of the SEC S-1 statement, defendant ADAMSON's CEO ALTAHAWI delayed the required financial statement audit by delaying his auditor recommendation, so Lead Plaintiff's company was unable to file audited financial statements with the S-1 public offering statement for timely SEC review. In the meantime, other actions were taken by defendants in Lead Plaintiff's captive environment to orchestrate delays and exhaustion of company and personal funds, so Lead Plaintiff and Winnett were unable to pay the auditors to provide the signed audit opinion within the required SEC filing period, which then expired for the S-1, effectively trashing the entire set of expenditures made by Winnett and further extending involuntary servitude and acts, violations, and injuries by defendant UNITED STATES and its co-conspirators.

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

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

Interline Exhibits:	7 specifically, 4-12
Complaint paragraphs:	471-489; 474, 474, 651-672 RICO-13-34 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-	2-0039, 2-0053, 2-0054, 2-0059, 2-0173
12120 paragraphs:	
LPEE pages (see technical note	8507-8514, 8565-8626, 9923
on page numbering at	
paragraph 230):	
Emails and documents by topic	AJSH Jain re xmit audited fin stmts 151205,
and date, also located in LPEE:	ALTAHAWI re S1 PPM fees 150909,
	ALTAHAWI 40K and info for S1 PPM 150910,
	ALTAHAWI re PPM corrections150919,
	ALTAHAWI re any progress S1 PPM 150928,
	ALTAHAWI re auditor ref 150929,
	ALTAHAWI PPM progress 151001,
	ALTAHAWI re auditor engagement ltr 151001,

ALTAHAWI S1 PPM progress 151005, ALTAHAWI PPM connection 151007, ALTAHAWI re Jabor MEC fee 151028, ALTAHAWI Tracy re 100mm debt PPM 151203, ALTAHAWI Jain re auditor consent 160108, ALTAHAWI re auditors 160111, ALTAHAWI on status 160115, ALTAHAWI on status 160126, ALTAHAWI on status 160324, ALTAHAWI on status 160401, ALTAHAWI on investor search fail 161122, ALTAHAWI re status 161122, ALTAHAWI re Dropbox Access to BLACKPOOL 170202, ALTAHAWI Auditors popup 171114, ALTAHAWI ADAMSON 150908 Capital Markets Agreement Signed 150908.pdf ALTAHAWI ADAMSON 150908 Consultency Agreemnt, Winnett Perico Signed 150908.pdf ALTAHAWI ADAMSON 22MM WP PPM FINAL 150920.pdf ALTAHAWI ADAMSON Consultancy Agreement ANNEX A.pdf Ibankattny S-1 update email 161022, KUNSAK re ALTAHAWI ADAMSON Contract 160108, WO Status Report ADAMSON PPM 150917, WO Team re PPM S-1 processes 150921

# 661. RICO-23 Racketeering Violations: Fraudulent Financings, International CFIUS Pretexting 2015

A. At Lead Plaintiff's request, Defendant SULLIVAN (paragraph 171, 626A(v) RGTS-6, then representing himself as a former CPB investigator and attorney as a result of an introduction by JACKSON) consulted a third party attorney to assist in determining the veracity of the Qatar Ministry of Economy and Commerce document (LPEE pages 750-752) required to secure a license to process a USD \$52,000,000 investment by Jabor International Investment QSC, ostensibly controlled by members of Qatar's al-Thani royal family. Lead Plaintiff's company, Winnett, paid \$9975 by wire transfer to an account in the United Kingdom (not Qatar). See LPEE pages 754-765, 10108-10118.

B. On knowledge and belief, this alleged investment was in fact a defendant CIA international fraud and forgery in the name of the Qatari royal family using official government forms. The \$9975 wire transfer to the United Kingdom (not to Qatar) was just under the \$10,000 government disclosure limit, as intended by defendant UNITED STATES to conceal this transfer from official US government records during perpetration of this fraud by defendant UNITED STATES (most probably CIA), in the same pattern demonstrated at paragraph 656C RICO-18, Bank of America, Ramsey, NJ when \$9200 cash had to be physically transferred from Wells Fargo, Ramsey, NJ to Bank of America, Ramsey, NJ. Similar property theft abuses just under the \$10,000 reporting limit which also constitute racketeering acts in deprivation of property rights by defendant UNITED STATES include paragraphs 610I HEXP-7, 656 RICO-18, 830D, 831G, and an international \$5,000 reporting limit at paragraph 665.

C. Lead Plaintiff took a copy of this signed \$52 million Jabor International Investment QSC agreement with him to an October 2015 organic vegetable packing plant construction design meeting in the otherwise empty Willmeng Construction headquarters building in Maricopa County, AZ. He showed the signed \$52,000,000 financing contract document to ARPAIO (known as Greg Crossgrove, defendant MARICOPA SHERIFF, ARPAIO) who sat to the Lead Plaintiff's immediate left, as they faced a large video conference viewing screen for a project design progress discussion with Lino BELLI and his Belli Architectural Group team members, Salinas, CA, for the WinnettOrganics (a Winnett trade name) Central Arizona Distribution Center organic vegetable production plant planned for Eloy, AZ. See LPEE pages 1740, 8489-8506.

D. Since the ostensible \$52 million investment involved members of a foreign government in a material investment in a US business, it would have required review by CFIUS,

yet another fraudulent entrapment pretext in the long-running series of defendant FBI and CIA entanglement and entrapment attempts to sustain their associated-in-fact enterprise acts, violations, and injuries directed at Lead Plaintiff for the purpose of perpetuating illegal BRMT development and deployment operations in their on-going pattern of illegal BRMT, rights, and racketeering acts, violations, and injuries which are representative of these associated-in-fact enterprise patterns perpetrated against this class of plaintiffs. Lead Plaintiff discussed this CFIUS review requirement with SULLIVAN, a well-experienced ostensibly former defendant DHS CPB attorney and investigator who had worked with CIA and JACKSON, but the fraudulent defendant UNITED STATES (FBI/CIA) \$52 million investment never transpired, as was defendant UNITED STATES pattern of practice to and since that time.

E. Lead Plaintiff also spent an extra week in Tucson, AZ during this time waiting for a site visit by Dr. Moise Anglade, a Miami, FL area cardiologist, allegedly interested in making a six figure investment. Anglade cancelled the meeting late in that week of waiting by Lead Plaintiff, another now familiar delaying tactic of defendant FBI to expend the limited resources of others to pursue its pattern of racketeering acts while interfering in interstate commerce.

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

directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	4 through 14
Complaint paragraphs:	171, 626A(v) RGTS-6, 656C RICO-18; 474, 474, 651-672
	RICO-13-34 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-	2-0039, 2-0047, 2-0053, 2-0054, 2-0059, 2-0171, 2-0173, 2-
12120 paragraphs:	0179
LPEE pages (see technical note	754-765, 10108-10118; 1740, 8489-8506
on page numbering at	
paragraph 230):	
Emails and documents by topic	BELLI 14077 BELLI-WO PSA Signed 150917.pdf
and date, also located in LPEE:	BELLI 14077 WO Mtg Agenda Salinas 150925.pdf
	BELLI 14077_Meeting Minutes 150918.pdf
	BELLI 14077_Project Contacts 150925.pdf
	BELLI 14077_Winnett Organics Kick-Off Meeting Minutes
	1 150925.pdf
	D Brewer Air Itenerary EWR PHX Hold for Anglade EWR 150830.pdf
	D Brewer Car Rental Itenerary EWR PHX Hold for
	Anglade EWR 150830.pdf
	D Brewer FS for SBI Surety Bond 413-NEW-as-of-7-30-
	2018 180730 .pdf
	D Brewer Hotel EWR PHX Hold for Anglade EWR
	150830.pdf
	D Brewer Hotel Tucson EWR PHX Hold for Anglade EWR
	150830.pdf
	D Brewer US Airways EWR PHX EWR 150830.pdf
	Swisslog Winnette Organics-Budget Proposal 12-28-2016
	v1_1 161228.pdf

Jabor Funding Due Diligence151012,
Jabor dilution and free trading share plan 151014,
Jabor investor team info to SULLIVAN 151020,
Jabor Due Diligence Info SULLIVAN 151021,
Jabor Funding Agreement 151021,
Jabor investor wire xfr date 151021,
Jabor Funding Stock Adj PETERSEN 151022,
Jabor Funding wire tomorrow 151026,
Jabor Funding MEC fee and agreement sig page 151027,
Jabor MEC fee wire xfr record TD Ameritrade 151028,
Jabor Funding MEC fee wire MIA 151030,
Jabor Funding Cinfirm to BELLI Salinas 151105,
Jabor Funding Bust 151119
DoubleK Invoice Ricky King 10132- 10133

## 662. RICO-24 Racketeering Violations: Fraudulent Financing Fees Supporting Fraudulent Sales Opportunities 2018

A. Defendant SALLYPORT, a commercial financing company domiciled in Texas, was paid an application fee of \$2,000 for Accounts Receivable and Purchase Order financing services which arose as a result of, and/or were interfered with, by defendant UNITED STATES and its co-conspirators, through their offering of fraudulent pending sales orders and contracts in 2018 which they had no intention to complete, and which were elements of a pattern of commercial entity and police powers frauds and conspiracies of defendant UNITED STATES and its co-conspirators in commerce and interstate commerce, which have and do consume financial resources and management time of Lead Plaintiff and the entities he has and/or does legally own, control, and/or manage. See LPEE pages 9271-9272, 9281-9283, 9312-9313, 10005.

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

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

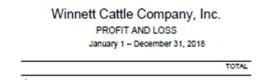
Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members,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

Interline Exhibits:	4 through 14
Complaint paragraphs:	474, 474, 651-672 RICO-13-34 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-	Not applicable
12120 paragraphs:	
LPEE pages (see technical note	9312-9313, 9271-9272, 9281-9283, 10005
on page numbering at	
paragraph 230):	
Emails and documents by topic	180814 SALLYPORT 1750K SCF Proposal Letter Winnett
and date, also located in LPEE:	Cattle Company Inc_(003) 180814.pdf
	180414 SALLYPORT Signed SCF Proposal Letter Winnett
	Cattle Company Inc_(003)
	180616 SALLYPORT Signed SCF Application 180616.pdf

#### 663. RICO-25 Racketeering Violations: Fraudulent Financing Fees 2018

A. Lead Plaintiff business entities paid fees to alleged financial services providers in April, August, and October of 2018 totaling \$14,950. Access to the accounting detail which identifies these potential defendants is currently blocked from access by defendant UNITED STATES, so the payees' identities and the exact amounts of these payments are currently not discernible. See LPEE pages 10026, 10027 second line, 10028 second line (also excepted below), for the currently accessible recordation of these expenditures.

LPEE page 10026 excerpt:



LPEE page 10027 excerpt (2018 summary from accounting records):

	JAN	FEB	MAR	APR	MAY	JUN	JUL
Bank fees			1	89			
Financial provider fees					5450		
-							

LPEE page 10028 excerpt (continuing the 2018 record above to succeeding months):



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

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

Interline Exhibits:	Not applicable
Complaint paragraphs:	474, 474, 651-672 RICO-13-34 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-	2-0039, 2-0047, 2-0053, 2-0054, 2-0059, 2-0171, 2-0173, 2-
12120 paragraphs:	0179
LPEE pages (see technical note	10027 second line, 10028 second line
on page numbering at	
paragraph 230):	
Emails and documents by topic	Blocked by defendant computer email access hack
and date, also located in LPEE:	

#### 664. RICO-26 Racketeering Violations: Fraudulent Financial Services – Domestic Debt Broker 2018

A. Defendant NEW AMERICA LENDING, a Illinois domiciled LLC owned and managed by David Choate HUGHES, which has and/or does engage in commercial financing and broker/finder of private investors for commercial enterprises company was paid fees totaling \$7,500 to arrange or complete financing for the Lead Plaintiff's company, to be supplied by defendant NEW AMERICA LENDING, as represented by HUGHES in these transactions as

using its own internally controlled loan and equity investment funds, and those of third parties to be raised by defendant NEW AMERICA LENDING, to finance general working capital, specific assets, and/or sales opportunities of the Lead Plaintiff's Winnett commercial entities. Lead Plaintiff entities were defrauded by these bad faith acts of NEW AMERICA LENDING and HUGHES. See LPEE pages 9314-9318, 9328-9337, 9394-9401, 9653, 10011, 10021. Relevant emails form this period are currently blocked by defendant UNITED STATES as this Complaint is being prepared. HUGHES was either a defendant FBI agent, asset or investigatory subject permitted to enter the carefully controlled electronic environment used violate constitutional rights and to sustain the involuntary servitude and control of Lead Plaintiff as an involuntary human subject of the illegal BRMT bioweapon and bioweapon delivery system program and the associated-in-fact enterprise of defendant UNITED STATES, DOJ, FBI, CIA, ARMY, NIAID, and the individual defendants associated therewith, together with all their contemporaneous co-conspirators.

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

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

Interline Exhibits:	4-14
Complaint paragraphs:	474, 474, 651-672 RICO-13-34 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-	2-0039, 2-0047, 2-0053, 2-0054, 2-0059, 2-0171, 2-0173, 2-
12120 paragraphs:	0179
LPEE pages (see technical note	9314-9318, 9328-9337, 9394-9401, 9653, 10011, 10021
on page numbering at	
paragraph 230):	
Emails and documents by topic	150130 MULTIFUNDING SULLIVAN re referral to David
and date, also located in LPEE:	HUGHES 150130 Bates.pdf
	180823 NAL HUGHES \$2point5MM Initial Term Sheet
	debenture 180823.pdf
	180823 NAL HUGHES \$2K Wire Details 180823.pdf
	180905 NAL HUGHES Consulting Agreement Winnerr
	180905.pdf
	181012 NAL HUGHES 350K min Winnett Conditional
	Term Sheet (002) 181012.pdf
	181012 NAL HUGHES \$5000 Compl Wire 181012.pdf

665. RICO-27 Racketeering Violations: Fraudulent Financial Services -International Debt Broker 2015-2016

A. Winnett expended \$4,950 with PPM Experts in Europe for the preparation of a Private Placement Memorandum required for fraudulent private placement services by defendant INSIGHT NETWORK and Don KEISER, which thereupon engaged in pretending to work to place \$100 million of debt with European and other investors and submitted false and

misleading progress reports to Lead Plaintiff by email and phone. Exactly zero dollars were raised in this fraudulent scheme, another in the long-running series of investor and investment finder/banker agreements frauds failing to provide honest services in interstate commerce.

During this same period, other actions were taken by defendants in their captive environment of Lead Plaintiff to continue to exhaust personal and business entity funds, see paragraphs 612

HEXP-9, 622 637 RGTS-2, 17; paragraphs 640, 655-661, 668-670 RICO-2, 17-23, 30-32, as elements of this conspiracy across all defendants.

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

Interline Exhibits:	4-14
Complaint paragraphs:	474, 474, 651-672 RICO-13-34 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-	2-0039, 2-0047, 2-0053, 2-0054, 2-0059, 2-0171, 2-0173, 2-
12120 paragraphs:	0179
LPEE pages (see technical note	8563-8564, 8627-8714, 9923
on page numbering at	
paragraph 230):	
Emails and documents by topic	INSIGHT KEISER Intl Debt placement 100mm 151028,
and date, also located in LPEE:	INSIGHT Ovcar Intl Debt placement 100mm 151029,
	INSIGHT KEISER Terms for Intl Debt placement 100mm
	151104,
	INSIGHT Verbal Commit by WO 151104,
	INSIGHT PPM Winnett Perico 151201,
	INSIGHT status inquiry 160112,
	INSIGHT status report 160113,
	INSIGHT status report 160122,
	INSIGHT re lack of progress 160418,
	PPM Expert Invoice 145.11-2015 Winnett Perico, Inc
	151117
	PPM Expert 100MM Debt Offer Document Winnett Perico
	160105.pdf
	PPM Expert Questionnaire 151123.pdf

## 666. RICO-28 Racketeering Violations: Fraudulent Financial Services – Mid-Market Investment Bank 2016-2017

A. Defendant MADISON STREET Capital's various officers and employees, while defendant police powers agents, officers, and/or confidential informants, and as a part of this ongoing conspiracy and pattern of racketeering acts, represented themselves and their firm as capable of and sincerely interested in, securing financing on behalf of Lead Plaintiff's business entities, and thereby conspired, during 2015 through 2018 in a complex sales, production, operations, and financing scheme and conspiracy to deprive Lead Plaintiff and his related entities of authentic opportunities to engage interstate commerce. This scheme required and

consumed the time and financial resources (\$1,950 per a signed agreement on April 5, 2018) of Lead Plaintiff and his business entities in the bad faith perpetuation of defendants' long-running schemes, frauds, and swindles.

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

Interline Exhibits:	4 through 14
Complaint paragraphs:	474, 474, 651-672 RICO-13-34 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-	2-0039, 2-0047, 2-0053, 2-0054, 2-0059, 2-0171, 2-0173, 2-
12120 paragraphs:	0179;

LPEE pages (see technical note	9270, 9722
on page numbering at	
paragraph 230):	
Emails and documents by topic	MADISON ST Capital 160328,
and date, also located in LPEE:	MADISON ST outreach 170726,
	MADISON ST Ibanker Madison St Capital initial hit
	170727

#### 667. RICO-29 Racketeering Violations: Fraudulent Financial Services - International Financial Services Institution 2016-2017

A. Defendant Bank of America BESTWICK CARDONE Group Senior Vice President Robert BESTWICK and Vice President Andrew CARDONE (defendant FBI Manhattan, New York) with offices embedded in Bank of America, N.A., at One Bryant Park, New York, NY, held a Natural Foods Symposium in New York City in May 2016, and invited Lead Plaintiff to this fraudulent conference for the purpose of sustaining involuntary servitude, defrauding, and acquiring intelligence, and to introduce Lead Plaintiff to DOMINICK investment banker Michael Callahan (KEENE), thereby aiding and abetting the fraudulent scheme, swindle, and conspiracy of defendant UNITED STATES and its co-conspirators. See also paragraph 668 RICO-30.

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

directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	4-14
Complaint paragraphs:	668 RICO-30; 474, 474, 651-672 RICO-13-34 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-	2-0178, 2-0179
12120 paragraphs:	
LPEE pages (see technical note	8805-8812, 9094
on page numbering at	
paragraph 230):	
Emails and documents by topic	BA BESTWICK CARDONE AXIAL Nat Food Symposium
and date, also located in LPEE:	160415,
	BA BESTWICK CARDONE on my BA history160502,
	BA BESTWICK CARDONE Fake Food Symposium
	160531,
	BA BESTWICK CARDONE on RAM CS sales contract
	160608,
	BA BESTWICK CARDONE referes Callahan (KEENE)
	DD 160707,
	BA BESTWICK CARDONE re intro at DD 160712,
	BA BESTWICK CARDONE progress report DD 160808,
	BA BESTWICK CARDONE lunch pre DD mtg 160927,
	BA BESTWICK CARDONE sked Kiely call 161024,
	BA BESTWICK CARDONE NYC Keily trust ref
	call161102,
	BA BESTWICK CARDONE on KROGER uptake agreed
	161110,
	BA BESTWICK CARDONE update 170227,
	BA BESTWICK CARDONE on Balckpool fail new search
	DD170323,

BA BESTWICK CARDONE on BLACKPOOL
SHEFFORD 170324,
BA BESTWICK CARDONE Fake Food Symposium
170516,
BA BESTWICK CARDONE Fake Food Symposium
170609,
BA BESTWICK CARDONE alt ibanker intro 171130,
BA BESTWICK CARDONE re Skaar alt ibankers intro
offer 171130

## 668. RICO-30 Racketeering Violations: Fraudulent Financial Services – Wall Street and Los Angeles Investment Banks 2015-2021

A. Defendants Michael Callahan (KEENE) and Mark GROSS, while acting as defendant agents, officers, or confidential informants, (defendant UNITED STATES' CIA, FBI, as well as media industry allowed to operate inside the conspiracy to obstruct interstate commerce) as part of this on-going conspiracy and pattern of racketeering acts, represented themselves and their firm, defendant DOMINICK, as capable of and sincerely interested in, securing financing on behalf of Lead Plaintiff's business entities, thereby conspiring, coordinating with, and playing an on-going role during 2016-2017, and thereafter into 2021 in a complex sales, production, operations, and financing scheme to deprive Lead Plaintiff and his related entities of authentic opportunities to engage interstate commerce (paragraphs 991., 222, 602 NSEC-3, 660, 667 RICO-22B, 29).

B. Robert FINKELSTEIN sustained a fraudulent relationship with Lead Plaintiff and his entities, misrepresenting his firm Del Morgan, domiciled in southern CA, as capable of and sincerely interested in, securing financing on behalf of Lead Plaintiff's business entities, thereby conspiring, coordinating with, and playing an on-going role during 2016-2017 in a complex sales, production, operations, and financing scheme to deprive Lead Plaintiff and his related entities of authentic opportunities to engage interstate commerce.

C. Other defendant bad faith actors and co-conspirators in this fraudulent scheme and swindle include, without limitation, defendants Joseph ARPAIO, both as MARICOPA SHERIFF and individually; Double K Farming and Ricky King, as an associate of ARPAIO; WALMART; KROGER; Willmeng Construction as to use of their facility by FBI, ARPAIO, MARICOPA SHERIFF; RAM Consulting; Richard MILLER, Steve SAYRE, Sean LYLE, and David HINSON (FBI); and fraudulent Winnett employees known to Lead Plaintiff as Bruce BLITCH, Michael CASTRO, Rafael GOMEZ, Peter LEBLOND, Jon NICKLESS, PAUL SMITH, Mark VINDIOLA, and Jason WASEMAN, while acting in bad faith, jointly and severally (paragraph 687 RICO-49).

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

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

Interline Exhibits:	4-14
Complaint paragraphs:	991., 222, 602 NSEC-3, 660, 667 687 RICO-22B, 29, 49;
	474, 474, 651-672 RICO-13-34 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-	2-0178, 2-0179
12120 paragraphs:	,
LPEE pages (see technical note	622-623, 632-635, 639, 642-643, 651-652, 656-658, 659-
on page numbering at	661, 8770-8787, 8788-8804, 8805-8812, 9193, 9207-
paragraph 230):	9214, 9277, 9280
Emails and documents by topic	AltaVista Investment Commitment- Winnett Perico,
and date, also located in LPEE:	Inc.161010,
	AltaVists faked fin 161017,
	AltaVista fup 161018,
	AltaVista key personnel intro 161018,
	AltaVista SULLIVAN re bad actor 161018,
	AltaVista WP due diligence on AV 161018,
	AltaVista fake followon funding annumnt 161025,
	AltaVista update 161026,
	BELLI 14077 BELLI-WO PSA Signed 150917.pdf
	BELLI 14077 WO Mtg Agenda Salinas 150925.pdf
	BELLI 14077_Meeting Minutes 150918.pdf
	BELLI 14077_Project Contacts 150925.pdf
	BELLI 14077_Winnett Organics Kick-Off Meeting
	Minutes 1 150925.pdf
	Centerboard Grp as Investor 170517,
	Centerboard Grp as Finder DD 170526,
	Centerboard PE intro 170526,
	D Brewer Air Itenerary EWR PHX Hold for Anglade
	EWR 150830.pdf
	D Brewer Car Rental Itenerary EWR PHX Hold for
	Anglade EWR 150830.pdf
	D Brewer FS for SBI Surety Bond 413-NEW-as-of-7-30-
	2018 180730 .pdf
	D Brewer Hotel EWR PHX Hold for Anglade EWR
	150830.pdf
	D Brewer Hotel Tucson EWR PHX Hold for Anglade
	EWR 150830.pdf
	D Brewer US Airways EWR PHX EWR 150830.pdf
	DD Engagement Letter Signed 160713.pdf

DD Signed Terminated Engagement Agreement Winnett-Dominick 5 31 17 171116.pdf DD Skaar JBS Letter 170522.pdf DD Skaar Teaser 170905.pdf DD Swisslog Winnette Organics- JAN Mtg 1-24-2017 v1 170124.pdf DD Callahan (KEENE) on Holistic Impact Partners 140417, DD on Oliver Term Sheet 160711, DD Callahan (KEENE) re engement ltr 160714, DD Callahan (KEENE) re cancelled Oliver mtg 160812, DD on Oliver Hyder resurrection 160824, DD re Revolution intro 160825, DD for Revolution WinnettOrganics Presentation 160910, DD Callahan (KEENE) 160914, DD on Revolution VC presentation 160919, DD on Nielson organic foods outlook 160920, DD on DelMorgan intro 160925, DD mtg fup 160929, DD Sep Discussion Document 160929, DD re work Wakefern connection 160930, DD Commitment Cmte pkg to Callahan (KEENE) 161006, DD re Kingman acquisition 161007, DD GROSS on other fin options 161014, DD re Alta Vista involvement 161014, DD Callahan (KEENE) re AltaVista 401pm 161017, DD notes on AltaVista offer 161017, DD Callahan (KEENE) 2 re AltaVista 161018, DD Callahan (KEENE) re AltaVista 1107am 161018, DD Callahan (KEENE) re AltaVista739pm 161018, DD GROSS on Alta Vista2 161018, DD GROSS re AltaVista 161018, DD on Alta Vista play out 161018, DD on Smith CFO Hyder Stall 161105, DD Hinson on production volumes 161106, DD Callahan (KEENE) on proposed WMT revision 161114, DD Callahan (KEENE) re investor interest 161115, DD on WMT Swisslog 161230, DD re 5 yr plan to WMT 161231, DD Callahan (KEENE) re 170124 Swisslog mtg 170109, DD Callahan (KEENE) re Swisslog mtg 170109, DD Callahan (KEENE) re lending DD name to WMT presentation 170126,

DD Callahan (KEENE) re Swisslog mtg fup 170126,

DD Callahan (KEENE) on BLACKPOOL funding 170202,

DD Callahan (KEENE) re BLACKPOOL Term Sheet 170202,

DD Callahan (KEENE) update BLACKPOOL 170227,

DD Callahan (KEENE) continue working 170328,

DD update to outside bridge potential investor 170410,

DD revised Bus Plan adds cattle 170417,

DD re Rabo ID Skaar 170503,

DD Skaar Site Plan Barns Winnet Site Opt 8 170509,

DD Transom re Skaar 170512,

DD on Skaar fert option 170513,

DD Skaar Barns Detail Site Opt 8 170523,

DD Fleming on DD Finl Model 170526,

DD Callahan (KEENE) re PE dilutive 170531,

DD on Skaar Organic Fertilizer Mkt Size 170531,

DD on Skaar Organic Fertilizer Plant Ops 170531,

DD on Skaar Organic Fertilizer Plant Concept Plan 170601,

DD Skaar Royal Chem CAS numbers Contract Fert Pkg 170604,

DD Skaar Site Plan 170605,

DD Skaar Site Plan Ammonia Recovery Manure 170605,

DD Skaar Organic Fertilizer Effectiveness 170607,

DD Skaar Organic Fertilizer Pricing 170607,

DD Skaar PE Investor Bid email 170607.

DD Skaar PE Investor Bid form 170607,

DD re Centerboard Housing Solution WO 170608,

DD WCC teaser draft 170608,

DD Skaar Organic Fertilizer Production Cost 170609,

DD Callahan (KEENE) re funding sked 170612,

DD Skaar Organic Fertilizer Advantages 170614,

DD WCC Pitch Deck Skaar et al 170614,

DD Callahan (KEENE) on DeSai 170616,

DD Skaar Biiding Process to SANDERS 170616,

DD Callahan (KEENE) on AXIAL lead Chatham 170619,

DD Skaar Site Plan Mods 170619,

DD NGEN fake NYC investor 170622,

DD NYC VAN BRAKEL 170622,

DD Callahan (KEENE) re AGIS NDA cmu not credible 170628,

DD Skaaar AgIS Boston 170628,

DD Skaar Advantage NDA 170628,

DD Skaar AgIS Boston 170628,

DD Callahan (KEENE) re Skaaar visit sked 170726,

DD on HIG Capital Miami 170728,

DD Skaar site visit Sander 170728,

DD JJU - Winnett Cattle Target Tracker 8 4 17 170804,

DD Skaar BDO Auditor SLC Gordon 170804,

DD Skaar BDO Auditor SLC Gordon 170807,

DD NYC Callahan (KEENE) connects to BDO SLC 170808,

DD Skaar Callahan (KEENE) Update 170809,

DD LABELLE Teton County 240 Tour Pass 170810,

DD Skaar Cost per pound gain 170811,

DD Skaar LOI xmit 170811,

DD Skaar LOI signing 170821,

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## 669. RICO-31 Racketeering Violations: Fraudulent Financings and Representation, Online Referral Services 2015-2018

A. Defendant AXIAL.com held an annual investor conference in New York City in Fall 2015 and invited Lead Plaintiff as an interested party. Defendants used this conference, open to the public, to arrange meetings with MADISON STREET Capital, Perella Wasserstein Partners, and Young America Capital, among others. Most of these meetings were carefully arranged for the purpose of screening, acquiring intelligence, and introducing Lead Plaintiff to other defendant police powers officers, agents, and confidential informants to further defendants' fraudulent scheme and swindle by portraying themselves as capable of and sincerely interested

in, securing financing on behalf of Lead Plaintiff's entities, thereby coordinating with and playing an on-going role during 2015 through 2018 in the continuation of their decades long complex sales, production, operations, financing and litigation scheme to deprive Lead Plaintiff and his related entities of authentic opportunities to engage interstate commerce.

B. Defendant AXIAL personnel also later reintroduced themselves using AXIAL email addresses and phone calls to refer Lead Plaintiff to other similar fraudulent contacts and to cut out any contact between Lead Plaintiff and any serious investor interest from the real business and investor community as he made good faith attempts to pursue financing in interstate commerce.

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

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

Interline Exhibits:	4-14
Complaint paragraphs:	474, 474, 651-672 RICO-13-34 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-	2-0039, 2-0047, 2-0053, 2-0054, 2-0059, 2-0171, 2-0173, 2-
12120 paragraphs:	0179
LPEE pages (see technical note	AXIAL Investor Interest 150904.pdf
on page numbering at	AXIAL to ALTAHAWI connect 150910.pdf
paragraph 230):	AXIAL NYC re Investor Referrals 171108.pdf
	AXIAL re Paine Schwartz 171113.pdf
	AXIAL NYC FRACTAL Intro 171116.pdf
	AXIAL NYC FRACTAL stall 171129.pdf
	AXIAL NYC FRACTAL stall 171204.pdf
	AXIAL NYC FRACTAL drag out 171206.pdf
	AXIAL fake investor leads 180302.pdf
Emails and documents by topic	AGI 1 NYC Investor hit AXIAL 170515,
and date, also located in LPEE:	AGI 1 Lee Mtg Set 170517,
	AXIAL Investor Interest 150904,
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## 670. RICO-32 Racketeering Violations: Fraudulent Financings and Financial Representation, Fraudulent Solicited Responses 1986 to 2022

A. Fraudulent commercial financing opportunities required the Lead Plaintiff and his related business entities to expend time and financial resources to locate and attempt to secure these alleged but fraudulent financings, and occurred in conjunction with both fraudulent sales opportunities and fraudulent property acquisitions arranged by defendants in conspiracy with other defendants, including, among others, individual persons and marital communities as owners; various forms of commercial enterprises, some as direct co-conspirators and others who were being spoofed by defendants.

B. Defendants have and do make common use of interstate wire fraud, mail fraud, inperson visits, entertainment, travel, and other means requiring expense or efforts by the Lead Plaintiff on his own behalf and for his business entities. These individuals and entities include, without limitation, all named defendants in various schemes as experienced by Lead Plaintiff and these various business entities, dating from 1986 to 2022 as listed in the Compendium at LPEE pages 934-1075, the table at paragraph 226 (defendants section), as well as those listed below. These defendants include domestic and international entities and individuals legally named above in this Complaint when known, and named as commonly known herein, and/or spoofed as the authentic entity by defendant UNITED STATES and other governments with police powers, their officers, agents and confidential informants, and with bad actors carefully screened-in by these defendants, including many entities for which there is no available prediscovery evidence that disbursements have been made but that nonetheless required time and resources of the Lead Plaintiff and his business entities to pursue based upon their fraudulent misrepresentations. Many of these are most probably the fictional creations of defendant

UNITED STATES, but those entities are not discernible from authentic entities which also engaged in fraudulent acts. They must necessarily be deduced using discovery from these defendants. These individuals and entities include, without limitation, the following 220 plus domestic and international entities and individuals: Bank of America BA BESTWICK CARDONE; DOMINICK; Alta Vista; EarlyBird Capital; Chardan; NGEN; US Bank; Rabo Bank; JP Morgan Chase; NEW AMERICA LENDING; Intrepid Capital; Jabor; NHIG; JCXL; Alfardan; RJ Lumba; William Hoyle; Worldwide Financial; Stratos Commercial, Tesiina PAINTER; Warren John, Borgenson; Kabah family; LIBERTY WEST Regional Center; Vision Partners; Trinity; Blumberg; Whitestone, Lex Gubsky; Ken Shepherd; MULTIFUNDING; Utica Leaseco; Reich Bros; Viking Equipment Finance, Jim Buckingham; RAM Consulting, Richard A MILLER; DelMorgan, Robert FINKELSTEIN; Moise Anglade; Fiera Comox; Barings; FRACTAL Advisors; Black Lake Capital; Summit Partners; Summit Investment; NBH Banks; Great Western Bank; Currency Capital; Dynamic Capital; Al Mal; Kennedy Financial; Commercial Finance Partners; Capital Source Group; Ag America; World Business Lenders; Axos Bank; Patriot Funding/David Antonelli; Capital Markets Expert; Johnston-Todd; Business Capital; SouthStar; AgAmerica; Capstone Trading; AAY Panama; Credit Lyonnaise Laing/Michael Kurtanjek; Coco Capital; SOLE SOURCE Capital; Mayfield VC; Legendary VC; VII Capital; Vendome Bond; Songbird UK; Liquid Capital; Lantern Capital Advisors; Key and Company, David Key; JCXL; Jack Burstein; Zayid Mohammed; Isaac Capital; Interstate Capital; INSIGHT Network; Holistic Impact Partners; Harvest Returns; Fisher Enterprises; Equilibrium Capital; Centerboard Group; Farm Enterprises, Margie Costamanga; Brereton Hamilton; Elkehereiji; HIG Capital; Riverside; Armonia, Jasper VAN BRAKEL; Manna Tree; Crystal Lands Resources; Crestnorth Capital; Conterra; Correlation VC; Ethan Blum; Charles

Blair; Big Path Capital; BANCO Advisors; Auctus Capital; Armgold Harmony; Arlon; Alam Junaid; Hurwitz Financial; Silverwood Partners; Firelake Capital; Fountain Partners; Ridgestone; Chess Capital Partners; Endeavor; Republic Business Credit; Loan Whisperer; LeaseQ; Falcon Investments; CFA Omaha; Hawthorne Equity Partners; LNK Partners; MSTCPT; KLC Financial; Land O Lakes; BBVA; Ranch Creek; Hillstar Capital; AGR Partners; High Street Capital; C6 Capital; MetLife; Ag Lending Group; BMO; Arizona Bank and Trust; Bank of Tucson; Wells Fargo; Liquid Capital Express; FSW; Paramount Payment; Grand Canyon RC (EB-5); Prudential; United Financial Investment Group; Broadmark Capital; Zions Bank; Green Card Fund; TTM Capital; London Manhattan; Crucible Capital; Roth Capital Partners; Trianz; Citi Financial Group; Clarke Advisors; Noble Business Lending; Funding Merchant Source; Crowd Fooding; AgFunder; Prosperity Funding; Business Backer; YA Capital; Altima Partners; JACKSON Consulting Group; IPO Capital UK; Premier Financial Services; Commerce Bank Arizona; Merchant Finance; GUD Capital; Lynwood Capital; Headwaters Merchant Bank; Pinnacle Ventures; LGV Partners; New Star Financial; SJF Ventures; Farwest Capital; Resource Land Holdings; VN Partners; Cobank; Huron Capital; BLC Lending; Brickell Financial; Siena Lending; FCP Capital; DB Capital Solutions; First Capital Business Finance; Midland American Capital; Black Coral Capital; Olin Capital; US Capital Partners; SuperG Funding; Modern Capital Solutions; Brightway Financial Group; Sherbrooke Capital; WGIM Global; FS Equity; Point Financial; Clarion Partners; Biltmore Bank; Wall Street Strategic Capital; Nations Equipment Finance; MARV Capital; Fire Lake Capital; Perella Wasserstein Partners; Lycom Financial Group; Farwest Capital; Comerica; Mainstreet Capital; TDP Fund; Farmland LP; Blue Leopard LLC; SCS Dynamics; Don L Wood; Open Prairie; Chase Winters; New Seed Advisors; Bahraini Investment Group; Biz2Credit; American United

Capital; Vertex Financial; Phoenix Global Finance; Brahma Lending; West Monroe Partners; Lucid Solutions; Popular Commercial; ITBMS Global; BIBBY Financial; Bradley Gibson; CROSSROADS FINANCIAL; MB Financial; BLACKPOOL (various entities); SHEFFORD (various entities); Priority Funding; and various unknown Canadian broker and investment banker entities, typically doing business related directly or tangentially to the Vancouver Stock Exchange and with offices in the Vancouver, British Columbia area.

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

Interline Exhibits:	4-14
Complaint paragraphs:	226, 474, 474, 651-672 RICO-13-34 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-	2-0039, 2-0047, 2-0053, 2-0054, 2-0059, 2-0171, 2-0173,
12120 paragraphs:	2-0179, column entitled Actions: Destroy Career,
	Businesses; Pretext, Entrap, Incriminate 2-0165 through 2-
	0179
LPEE pages (see technical note	See Compendium at LPEE pages 934-1075 for selected
on page numbering at	relevant emails and documents related to each entity and
paragraph 230):	individuals named in this subcount. Full documentation to be provided in discovery.
Emails and documents by topic	AAY Investments Panama Info Form PO Fin \$3MM SBI
and date, also located in LPEE:	AAY CIS – 2020 Completed 200306.pdf
	AgAmerica Reiten Big Sandy loan re pers gty issues
	210304,
	AgAmerica attempt Miles Reiten Big Sandy pers gty 210322,
	AgAmerica Miles Reiten 210415,
	AgAmerica Reiten sked call 210707,
	AgAmerica Carson re WMT organic sales progress
	210716,
	WCC AgAmerica Land Loan Application FL 3MM 190730.pdf
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	Alfardan loan proposal accepted 160512,
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lenders 151102,

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BLACKPOOL 20MM WinnettOrganics Term Sheet Executed 170202.pdf

BLACKPOOL Private Placement Offering Doc Winnett 150618.pdf

BLACKPOOL SHEFFORD Consulting Agreement \$1MM WinnettOrganics Fully Executed 161129.pdf BLACKPOOL Bridge Loans Brochure 10138-10156

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Capstone Trading re fin 210901,

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Chardan SPAC overview (June 2017) - \$50 MM

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Blum Signed Agreement Blum 130620.pdf

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## 671. RICO-33 Racketeering Violations: Commercial Frauds: Fraudulent Financings and Litigation - AUCTUS v. CORNHUSKER, 2019

A. Defendant Reginald MCGAUGH, acting as a defendant agent, officer, or confidential informant, and part of this on-going conspiracy, represents himself and his firm, defendant CORNHUSKER Capital, as capable of and sincerely interested in, securing financing on behalf of Lead Plaintiff's entities, thereby coordinating with and playing an on-going role during 2019 in a complex sales, production, operations, and financing scheme to deprive Lead Plaintiff and his related entities of authentic opportunities to engage interstate commerce.

B. This color of law swindle required and consumed the time and financial resources of Lead Plaintiff and his business entities in the bad faith perpetuation of defendants' long-running schemes, frauds, swindles and associated-in-fact enterprise pattern of racketeering acts affecting interstate commerce. The \$2,500 retainer required by CORNHUSKER was delivered directly from investor DEAN T. SMITH to CORNHUSKER and is counted as a portion of a \$5,000 loan in January 2019 from DEAN T. SMITH to Winnett. As frequently occurred in his interactions with defendants, the Lead Plaintiff signed the agreement first and never received a fully executed copy of the agreement, though the retainer was represented as received from DEAN T. SMITH and the acts required of defendant under the agreement were represented as being conducted in good faith through communications between the Lead Plaintiff and the defendant(s) as counterparty. But there were absolutely no tangible results as usual as defendants MCGAUGH and CORNHUSKER interfered in and affected interstate commerce. See LPEE pages 10119-10124, 10125, 10158-10164. Relevant emails from March 4, 2018 through July 9, 2020 are currently blocked without warrant by defendant UNITED STATES as this Complaint is being prepared, paragraph 47.

C. Further, defendants ostensibly conducted litigation in Cook County, IL between defendant AUCTUS (founder MCGAUGH) and defendant CORNHUSKER (founder MCGAUGH after leaving AUCTUS) for client poaching by CORNHUSKER of Lead Plaintiff's company, Winnett, from AUCTUS. This requires extensive efforts to comply with a Cook County, IL court subpoena served on the Lead Plaintiff and his company, to spy upon and consume time and resources in this color of law fraud. See LPEE pages 10126-10131, 10158-10163.

D. This is a variation on the usual direct litigation theme defendants have used frequently when attempting to run up expenses and reduce cash flow to plaintiffs of this class. Defendants also attempted this specific approach in the Tower Books bankruptcy case around 2003, in an effort to arrange the Lead Plaintiff's potential avoidance of a lawful subpoena, which can lead to criminal charges for failure to appear and cooperate. And, of course, color of law discovery in "litigation" is an alternate method of spying without warrant. See also other such abuses of the litigation process by defendant UNITED STATES at paragraph 643 RICO-45.

E. This is an element of the now quite the familiar pattern of "sources and methods" used by defendant police powers who violate the Fourth Amendment by alternate means, using pretexted email fraud and wire fraud under color of law to engage in illegal searches, later sanitized as legitimate searches developed through informants and then misrepresented to federal courts to secure legally required warrants to support criminal prosecutions, which themselves are not necessarily based in reasonable suspicion, but rather on the specific targeting and headhunting of particular individuals and entities, which practice defendants UNITED STATES and other police powers defendants have and do repeatedly engaged in bad faith against the rights and interests of Lead Plaintiff and others similarly situated.

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

Interline Exhibits:	4-14
Complaint paragraphs:	643 RICO-45; 474, 474, 651-672 RICO-13-34 generally
Appendix 2 paragraphs:	Not applicable
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230):	
Emails and documents by topic	Certain emails are blocked by a defendant UNITED
and date, also located in LPEE:	STATES computer hack

## 672. RICO-34 Racketeering Violations: Fraudulent Financings, Online Platform 2021

A. Defendants WEFUNDER and its officer and employees, through the various entities legally named in the caption, whether acting on their own behalf or as spoofed by other defendants with police powers representing themselves as defendant WEFUNDER personnel and as the actual website while acting as a defendant agent, officer, and as part of this on-going conspiracy, represented themselves, their firm, and their web platform as capable of and sincerely interested in, securing financing on behalf of Lead Plaintiff's entities, thereby coordinating with and playing an on-going role in 2021 and later years in a complex sales, production, operations, and financing scheme to deprive Lead Plaintiff and his related entities of authentic opportunities to engage interstate commerce.

B. This series of frauds and conspiracy required and consumed the time and financial resources of Lead Plaintiff and his business entities. Among defendants' bad faith acts were the refusal to permit the level of return to individual investors proposed for the offering by the Lead Plaintiff; and their role in knowingly recommending an auditor, Alice CHENG, who, after gathering key financial information on their behalf from Lead Plaintiff's company, refused to issue any form of the professional auditor Opinion letter required to complete the financial statements (LPEE pages noted in CHENG emails at subparagraph 672C below), so the fund raising process could be undertaken as planned in conformance with SEC Regulation A+. This scenario played out almost identically to defendants' previous frauds and swindles in paragraph 659 RICO-21 undertaken by defendant ADAMSON Brothers, most probably entirely a fraudulent construction in interference with interstate commerce by defendant UNITED STATES (FBI). This pattern of practice repeated prior fraudulent acts of defendants and effectively killed any possibility of this public financing, thereby, once again, sustaining

involuntary servitude and forced labor control of Lead Plaintiff while interfering in interstate commerce.

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

Interline Exhibits:	4-14
Complaint paragraphs:	659 RICO-21; 474, 474, 651-672 RICO-13-34 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-	Not applicable
12120 paragraphs:	
LPEE pages (see technical note	Not applicable
on page numbering at	
paragraph 230):	

Emails and documents by topic and date, also located in LPEE:

WEFUNDER Solicitation fup example 1of55 sent 210719, WEFUNDER MAGGARD re 2k 210720, WEFUNDER LABELLE re mandatory signup to vouch 210803, WEFUNDER GAAP Acctnt CHENG 210902, WEFUNDER start sequence 210903, WEFUNDER GAAP Acctnt CHENG Delays 210907, WEFUNDER re CHENG auditor delay 210908, WEFUNDER GAAP Acctnt CHENG 210909, WEFUNDER GAAP Acctnt CHENG 210909

#### 673. RICO-35 Racketeering Violations: Fraudulent Sales Leads 2002-2004

A. Lead Plaintiff's co-owned consulting company, Allegent, LLC dba Performa, in which he invested \$25,000 cash, provided a personal guarantee for a bank line of credit, and provided professional time and other resources, funded travel and other expenses in 2002-2004 to make sales calls on and submit consulting services proposals to Chelan Fruit, Chelan, WA, a former CNA client, to Bio-Lab, Lawrenceville, GA, both with defendant PRAY in attendance at sales meetings; and to approximately 15-20 defendant Technology Sales Leads (TSL) fraudulent (FBI staffed) sales opportunities across the United States from California to New York to Florida and many states in between (LPEE page 8290 and in evidence handed by Lead Plaintiff to defendant ROSENBERG (FBI) in Fall 2007, also likely in FBI lab archives from its cover mail-in service used in the hard drive recovery, as defendant ROSENBERG FBI was principal human trafficker of Lead Plaintiff from around 1983 to at least 2008). These fraudulent sales calls typically occurred in otherwise empty offices, plants, and warehouses, and required travel, printing, and mailing expenses to respond to fraudulent and non-existent consulting project opportunities presented by defendants, most probably entirely defendant UNITED STATES, to wit defendant FBI. Allegent, LLC dba Performa spent well over \$10,000 for travel, proposal preparation, office overhead expenses, and provided below market compensation to Lead

Plaintiff and his co-managing member PRAY which relationship was legally formalized by Michael LARSON, introduced by John C.T. CONTE, a defendant UNITED STATES (FBI) embed in various roles who professionally befriended Lead Plaintiff during his time at LazerSoft immediately after the departure of defendant STONE from LazerSoft in 1986, and during his efforts to secure additional financing for LazerSoft. Unknown to Lead Plaintiff at the time, his "partner" defendant PRAY was actually directly associated with defendants, specifically defendant ROSENBERG (while both were at NutraSource, among other times) in this "managing member" role and his prior roles while employed with defendant to various predecessor firms (including cover operations). See LPEE pages 140 et al, 844, 6085, 8290.

B. Other evidence is currently inaccessible to Lead Plaintiff but is available on discovery on a computer hard drive image shared with defendant ROSENBERG, known as William Drumm while General Manager of ESTABLISH for North America, unless subsequently destroyed by defendant FBI to obstruct this litigation and justice.

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

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

Interline Exhibits:	4-14
Complaint paragraphs:	673-680 RICO-35-42 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-	2-0107, 2-0117, 2-0135, 2-0140
12120 paragraphs:	
LPEE pages (see technical note	140 et al; pages 844, 6085, 8290
on page numbering at	
paragraph 230):	
Emails and documents by topic	Tech Sales Leads Revised TSL List 221007.pdf
and date, also located in LPEE:	

### 674. RICO-36 Racketeering Violations: Fraudulent Sales Lead Solicitation Services 2021

A. Defendants fraudulently failed to distribute or prevented the distribution of email correspondence to US persons on a mailing list purchased from EXACT DATA, a marketing list and email deployment service, by a Lead Plaintiff owned and managed entity, Sheldon Beef. This sales lead list and related services were purchased to solicit grocery industry executives and/or retail customers, and, as usual, accomplished no legitimate sales solicitations or results due to defendants' frauds in interstate commerce. Other such services were also purchased from various online services by this and other Lead Plaintiff owned and controlled entities, and also accomplished no authentic results in interstate commerce. This specific \$1065 expenditure in

interstate commerce is shown at LPEE page 10017. Related emails are currently blocked by defendant UNITED STATES.

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

Interline Exhibits:	Not applicable
Complaint paragraphs:	673-680 RICO-35-42 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-	2-0114
12120 paragraphs:	
LPEE pages (see technical note	10017
on page numbering at	
paragraph 230):	

Emails and documents by topic and date, also located in LPEE:

SBI Team Startup Sequencing Plan 210808,
SBI Team on further web slowness ABT sales 210910
Emails are currently blocked by defendant UNITED
STATES

### 675. RICO-37 Racketeering Violations: Fraudulent Sales Lead Solicitation Services 2021

A. Defendants fraudulently fail to or prevent the distribution of email correspondence services purchased from EGM, a marketing list and email deployment service, by a Lead Plaintiff owned and managed entity, Sheldon Beef, which purchased these services to solicit grocery industry executives or retail customers, and, as usual, accomplished no legitimate sales solicitations or results due to defendants' frauds. Other such services were also purchased from various online services and also accomplished no authentic results. This specific \$4342 set of expenditures in interstate commerce is shown at LPEE pages 140 et al, 10000, 10002, 10014, 10015.

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

Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626

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

Interline Exhibits:	4-14
Complaint paragraphs:	673-680 RICO-35-42 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-	2-0114
12120 paragraphs:	
LPEE pages (see technical note	140 et al, 10000, 10002, 10014, 10015
on page numbering at	
paragraph 230):	
Emails and documents by topic	Not applicable
and date, also located in LPEE:	

### 676. RICO-38 Racketeering Violations: Fraudulent Sales Lead Development Services 2017

A. Defendant TRADEKEY, a Pakistan domiciled company, conspired with other defendants to provide fraudulent contracted sales leads, and submit false sales lead progress reports using wire fraud and contract fraud. This fraud and swindle was an element of the pattern of racketeering act against Lead Plaintiff and his business entities to strip financial resources and authentic international sales opportunities of the company, perpetuating defendants' control and human trafficking of Lead Plaintiff in involuntary servitude, forced labor, and other violations of rights under law and ratified international treaties having force of law at all levels of government in the United States. These fraudulent services cost Lead Plaintiff's company \$6,000 and nearly two years lost for legitimate sales opportunities. See LPEE pages 140 et al, 8290, 9219-9222,

9241-9248, 9275-9276, 9300-9306, 9307-9310, 9340-9391, 9406-9534, 9926, 9984, 9989, 9997, 10004, 10007.

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

Interline Exhibits:	Not applicable
Complaint paragraphs:	673-680 RICO-35-42 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-	2-0114
12120 paragraphs:	
LPEE pages (see technical note	140 et al, 8290, 9219-9222, 9241-9248, 9275-9276, 9300-
on page numbering at	9306, 9307-9310, 9340-9391, 9406-9534, 9926, 9984, 9989,
paragraph 230):	9997, 10004, 10007

Emails and documents by topic TRADEKEY KYC Form Complete 180313.pdf and date, also located in LPEE: TRADEKEY Orbit Winnett Cattle Company VIP Contract #89779 - C.PDF TRADEKEY Orbit Winnett Cattle Company VIP Contract #89779 180306.pdf TRADEKEY Orbit Winnett Cattle Company VIP Invioce 180425.pdf TRADEKEY VIP Contract #89779 180102.pdf TRADEKEY Winnett Cattle Company VIP Invoice #89779-B 180514.pdf TRADEKEY Winnett Cattle Company VIP Invoice #89779-C 180726.pdf TRADEKEY Winnett Cattle Company Working Report 181010.pdf TRADEKEY Winnett Cattle Company Working Report 181228.pdf Winnett Cattle Company Working Report181106.pdf Winnett Perico Bill for July 2018 180801.pdf

#### 677. RICO-39 Racketeering Violations: Fraudulent Sales Lead Development Services 2018

A. Defendant WEBLINK.in, domiciled in India, initiated useless web services development in lieu of the actual sales lead development services requested by Winnett, and \$639 was expended before the improperly provided services are cancelled. See LPEE page 140 et al, 9985, 10023.

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

directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	4-14
Complaint paragraphs:	673-680 RICO-35-42 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-	2-0114
12120 paragraphs:	
LPEE pages (see technical note	140 et al, 9985, 10023
on page numbering at	
paragraph 230):	
Emails and documents by topic	180501 WEBLINK Pymt180501.pdf
and date, also located in LPEE:	181203 WEBLINK \$500 Wire 181203.pdf
	181204 WEBLINK Invoice 181204.pdf

## 678. RICO-40 Racketeering Violations: Fraudulent Sales Opportunities, International 2020-2021

A. Fraudulent international sales and sourcing opportunities in the Middle East, China, southeast Asia, Australia, South America, Russia, United Kingdom, and various countries throughout Europe, involve several defendants posing as international traders between 2018 and 2022 including, without limitation, defendants Assure Group International (ASSURE GROUP, AGI), ABT Trading, DC INTERNATIONAL, Todd CRAFT, LEVERSTONE (Andrew CHO), TRADEIMPEX, and TRADIMPEX. Defendants provide fraudulent international sales leads and

fraudulent sourcing opportunities, using wire fraud and contract fraud. These fraudulent services have cost Lead Plaintiff owned and managed business entities extensive time, financial and other resources, and resulted in lost time and business development options for legitimate sales opportunities in interstate and international commerce. See LPEE pages 140 et al, 9260, 9547, 9548-9561, 9568-9572, 9840, 9890-9896, 9897-9901.

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

Interline Exhibits:	4-14
Complaint paragraphs:	673-680 RICO-35-42 generally

Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-	2-0114
12120 paragraphs:	
LPEE pages (see technical note	140 et al, 9260, 9547, 9548-9561, 9568-9572, 9840, 9890-
on page numbering at	9896, 9897-9901
paragraph 230):	
Emails and documents by topic	ABT ICPO Lan Zhou Utility Beef Qtrs 210913.pdf
and date, also located in LPEE:	ABT inquiry 200731,
	ABT Pork 6 way China 201008,
	ABT Pork 6 way China Referral Contract 201008,
	ABT Pork 6 Way Referral 201008,
	ABT FL Quote 210105,
	ABT re Korea Angus pgm 210118,
	ABT FL Quote 210123,
	ABT re Euro price quote request 210428,
	ABT China Utility Grade 210610,
	ABT re deboning labor costs and pricing 210613,
	ABT quote request for Houston TX delivery 210616,
	ABT re WhatsApp and Houston 210626,
	ABT Partner re China quotes 210902,
	ABT Partner re Freelancer label delay 210907,
	ABT re Lan Zhou ICPO LOI-FM-210913,
	ABT re pending contract 210914,
	ABT sends Lan Zhou ICPO-FB4-LZ-210914,
	ABT re further deadline extension request 210915,
	ABT re termination 210915,
	ABT Trader Liu Intl Termination 210916,
	ABT quote request 211223,
	AGI pork heads 200916,
	AGI Uruguay beef sale 210414,
	AGI RFQ non-GMO soybeans 210421,
	AGI non-GMO Soybeans 210527,
	AGI non-GMO soybean supplier quote reply to SBI
	210528,
	AGI non GMO soybeans 210531,
	AGI beef utility wrapped qtrs 210714,
	AGI re Q421 pricing 211017,
	AGI Trader quote request 211227,
	AGI coal handling inquiry 220622,
	AGI Quote Request 220701,
	<u> </u>
	AGI SBI unable to reply AGI disappears 220701,

ASSURE GROUP AGI signature page 201002.pdf Bawtry ProForma Invioce from WCC bdproforma 180530.pdf

Bawtry UK Winnett PO 180529.pdf

BR Packer Quote Request FOB Indonesia 210203,

BRF China re contact info for RMC China rep 210125,

BRF Brazil re pymt terms for new customers 210127,

BRF Quote Authentication Request 210127,

BRF\_Specification & Price Offer 2020 210127.pdf

Caviness CS Cattle re finishing contrct potential 200901,

Caviness on plant availability for slaughter pending order 210617,

Caviness re salughter availability 210915,

Cho Trader 200911,

Cho Trader re pricing 210104,

Craft sourcing agent and network on pork products 201014,

Craft re bogus chicken part ref photos and doc set 210123,

Craft re bogus chicken part ref photos and doc set2 210123,

Craft re bogus supply network 210127,

Craft re bogus suppliers prev provided 210128,

Craft re quote request 210227,

DC INTERNATIONAL DALEUSKI Passport DC Intl 180318.pdf

Est Date of DC INTERNATIONAL Sales Agreement 190310.pdf

Est Date of DC INTERNATIONAL Sales Agreement Signed 190310.pdf

DC INTERNATIONAL DALEUSKI re KUMIN intro 200902,

DC Intl Intro KUMIN Galkin 200902,

DC Intl re export mkt dev 201214,

DC Intl re export pgm 201214,

DC INTERNATIONAL DALEUSKI re pricing 201221,

DC Intl re Korea Angus pricing 210118,

DC Intl Beef Pricing Quote 210203,

DC Intl beef quote request 210712,

DC INTERNATIONAL DALEUSKI re pricing 211020,

DC Intl pricing avail ability 211020,

G3 Vancouver BC Terminal Transit for AGI Quote Request 211130,

Interbio ICPO Nº IBI-20190321-01 Beef Cuts Signed 190411.pdf Leverstone LOI Beef 190303.pdf Manning Beef CA quote request 210226, Manning Beef CA quote request reply 210302, Manning re contracts in process 210330, Manning China case ready 210405, Manning Beef re slaughter avialability 210914, Mercaimpex ES initial hit180301, Sadia BR re quote request 210124, Tradeimpex fup prior INSIGHT Network domicile 180301, Tradeimpex re Madrid air frieght 180301, Tradeimpex re Madrid air frieght differential 180302, TRADEKEY intro 170825. Tradimpex BR re retail prepack 210319, Tradimpex BR re quote 210325, Tradimpex BR re case ready retail prepack 210406, Tradimpex BR re China beef quotes 210423, Tradimpex BR soybean availability 210423, Tradimpex re prices quotes and competitiveness 210521

### 679. RICO-41 Racketeering Violations: Fraudulent Sales Opportunities, Domestic 1985-2022

A. Lead Plaintiff expended company and personal funds to prepare sales materials, develop sales leads, and secure sales for various entities he owned, controlled, and managed as a result of defendants' fraudulent sales opportunities from 1985-1993, and from 2002-2005, and from 2015 to 2022. While the records documenting this travel, and other direct and overhead expenses, and the related loss of sales revenue and personal income are not currently accessible to Lead Plaintiff, and are controlled or maintained by defendants, all these instances of interstate travel require expenditures of personal and company funds and are the subject of future discovery in this case.

B. Initial entrepreneurial efforts began in late 1983 with the personal expenditure of hundreds of hours and about \$4,000 of Lead Plaintiff's personal funds invested in software development for a hotel industry scheduling system, which was purposefully rejected by an agent of defendant UNITED STATES posing as the CFO of Westin Hotels in the Westin Corporate Headquarters in Seattle, WA, alongside ZOULAS and THORPE. This meeting and rejection occurred some months after the Seattle Westin cost reduction project, developed and managed by Lead Plaintiff, was completed. This innovative first of its kind services industry software system, similar to those now broadly used in services industries including, without limitation, hotels, banks, and retail stores to control labor costs and manage customer service levels, was declined, unknown to Lead Plaintiff at the time, for the purpose of sustaining the illegal human trafficking, human subject medical experimentation without consent, involuntary servitude, and forced labor of the Lead Plaintiff by defendant UNITED STATES.

C. Defendants collectively engage in contributing to this conspiracy through the use of their facilities, websites, personnel, email addresses, and other means to conspire in and facilitate these extended series' of constructive frauds which are intended to perpetuate, deprive, and entrap Lead Plaintiff while starving his various enterprises of legitimate commercial opportunities to engage in interstate commerce. These defendant commercial business entities include, without limitation, the named defendant entities commonly known as WALMART and WALMART China, Bentonville, AR; KROGER, Cincinnati and Blue Vine, OH; Alberts Organics, Los Angeles ,CA; COSTCO, Issaquah, WA; VENDORCO, San Diego, CA; various defendant Skaar Livestock and related entities, Lewistown, ID; BDO, Salt Lake City, UT; Bay State Milling, Boston, MA; Briggs & Stratton, Wauwatosa, WI; Badger Meter, Milwaukee, WI; Raynor Garage Door, Dixon, IL; First Alert, Aurora, IL; Borg Warner, Muncie, IN; Adtran,

Huntsville, AL; Western Digital, San Jose, CA; currently unidentifiable grocery wholesaler in the midwestern states; Orange City Beef, Orange City, IA; Bio-Lab, Lawrenceville, GA; Brightstar, Miami, FL; Rockwell Collins, Cedar Rapids, IA; Rocketdyne, Folsom, CA; Steel and Pipe Supply, Manhattan, KS; Samsonite, Denver, CO; Holland Group, Holland, MI; PPG, Pittsburgh, PA; Clipper Windpower, Cedar Rapids, IA and Carpinteria, CA; various Canadian firms with offices in Vancouver, British Columbia, Canada. Other co-conspirators will be identified through recovery of Lead Plaintiff's own records from defendants as well as through defendants' discovery disclosures. These defendants conspire with and sustain, together with other known and as yet unknown defendants, the abuses and violations of law and rights in this long-running conspiracy and pattern of racketeering acts and rights violations. See LPEE pages 140 et al, 427, 430, 463, 518, 616-618, 693, 711-740, 8379, 9068-9078, 9093, 9193, 9194-9206, 9240, 9277, 9278-9279, 9280, 9392-9393, 9538, 9539-9545, 9547, 9573-9591.

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

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

Interline Exhibits:	4-14
Complaint paragraphs:	673-680 RICO-35-42 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-	2-0114
12120 paragraphs:	
LPEE pages (see technical note	140 et al, 427, 430, 463, 518, 616-618, 693, 711-740, 8379,
on page numbering at	9068-9078, 9093, 9193, 9194-9206, 9240, 9277, 9278-9279,
paragraph 230):	9280, 9392-9393, 9538, 9539-9545, 9547, 9573-9591
Emails and documents by topic	Alberts Organics first hit 140115,
and date, also located in LPEE:	Alberts buyer re free freight 140218,
	Alberts Organics Argiros and Pres phone mtg 170516,
	Alberts Organics as Customer 170516,
	Alberts Organics as Customer 170517,
	Alberts Organics as Customer 170619,
	Alberts Reorg replace Pres 170707,
	Alberts Organics 201312300955 New Vendor Form Signed
	140217.pdf
	Annies General Mills CROSS Marketing Discussion
	210818,
	Bay State Milling RFQ 220328,
	Bridges re organic produce PNW and COSTCO sales 140410,
	Bridges re production update 160922,
	CalOrganic Price List 201401301259 131021.pdf
	COSTCO Padilla on Craves 161110,
	COSTCO initial review 170630,
	COSTCO HUSKEY re China ofcs 210130,
	COSTCO HUSKEY re China ofcs 210207,
	COSTCO HUSKEY Update 210604,
	COSTCO HUSKEY on organic beef 210616,
	COSTCO HUSKEY re pricing organics 210617,
	COSTCO GC reply to verficiation request 211102,
	COSTCO GC Tepty to verticiation request 211102,

VENDORCO Walker SBI Teaser for COSTCO 190213.pdf VENDORCO Wlaker Signed Agreement COSTCO 190213.pdf

CrowdCow organic beef intro 210426,

DD re 5 yr plan to WMT 161231,

DD Callahan (KEENE) re lending DD name to WMT presentation 170126,

Earthbound Kodet re cust commitment and timing 140327,

EMN Europe Sales Network 180228,

EMN Euro unapproved 180301,

England Logistics WCC Signed CCLTL Customer Packet (Master) 180723.pdf

General Mills outreach re Annies 210806,

Hive re non-std product line 210914,

KROGER cold email initial hit 161005,

KROGER re mtg plan 161010,

KROGER re coming mtg 161107,

KROGER mtg contact info 161109,

KROGER mtg fup 161109,

KROGER Frys Avg Utilization Jose MERCED 161221,

KROGER Demand Projection MERCED 161223,

KROGER cust ltr request 170426,

KROGER re organic pork availability 210426,

Liu Markk re ICPO-FB4-LZ-210914,

Natural Grocers New Item Submission 210811,

NYC Ace Produce Hit 150724,

1856 001 SMETA Audit Invoice181011.pdf

Preferred Freezer CA Winnett Cattle 2018 Agreement

Preferred signed 180604.pdf

Pruska investor 161128,

Pruska investor 161129,

PWP update 160928,

RaboAg Kemp re Arlon Podzemny Perico 130203,

Rabo on Oliver Direct funding 160721,

Raboag Pitcher re Skaar review 170429,

Raboag Wilson TX 170531,

Rabo on organic fruits and veg mkt outllok 170822,

RAM initial meeting set 160325,

RAM re sales POs 160430,

RAM re Maines 160503,

RAM call to update RAM progress 160505,

RAM contract redline draft 160509,

RAM update 160526,

RAM re progress and concerns 160527,

RAM re progress and sales lead 160604,

RAM re sales leads progress 160609,

RAM inital referrer reconnect 160708,

RAM on CS sales mtg 160711,

RAM inital referrer reconnect 160720,

RAM Olin Capital Accepts Termination 160722,

RAM re DD Clark Mckenzie 160809,

RAM temriantion no results 160907,

RAM continues work 160911.

RAM re CS apptmt attempt 161027,

RAM CS regmts 161028,

RAM CS 161103,

RAM CS stall 161108,

RAM conv produce fail 161121,

RAM on conv produce contractual issues 161205,

RAM re conv produce agents sales progress 161215,

RAM failure on conv produce and lack of notice 161221,

RAM C&S WinnettOrganics C&S Presentation 160604.pdf

RAM Reinhart WinnettOrganics Reinhart Food Services 160609.pdf

Safeway Rayburn decline 210614,

SBI Team on WMT mtg plan 210702,

Sirk re selling product 210115,

Smith sales intro call in AZ 160704.

Smith Triple Fresh Contact on Sales Prospects 160907,

Smith Triple Fresh passes setback on sales 160915,

Smith re WMT prior sales agents failures 161011,

Smith re avocdos sales hook and PACA 161102,

Whole Foods Weening organic beef decline 210610,

WMT initial hit on cold email 161002,

WMT fup Baldwin 161010,

WMT MCCORMICK ref from Balwin 161011,

WMT sales news to WO team 161011,

WMT MCCORMICK Webex 161014,

WMT MCCORMICK call tomorrow email 161017,

WMT MCCORMICK call fup 161018,

WMT MCCORMICK call fup production volumes 161020,

WMT MCCORMICK call 161109,

WMT MCCORMICK re DD discussion 161114.

WMT MCCORMICK resked and participant list 161114, WMT MCCORMICK call fup 161116, WMT MCCORMICK call fup 161118, WMT MCCORMICK re investors ibankers 161121, WMT MCCORMICK on contract outline 170108, WMT MCCORMICK Bentonville Mtg Attendees 170111, WMT MCCORMICK 170224 Bentonville mtg Present Draft 170123, WMT MCCORMICK email Bentonville Mtg Presentation 170123, WMT MCCORMICK Bentonville Mtg Attendees 170216, WMT MCCORMICK Bentonville Mtg Invite 170216, WMT MCCORMICK Bentonville Mtg Location 170216, (see also LPEE page 1074U, entry 2/21/2017) WMT MCCORMICK Bentonville mtg fup 170222, WMT MCCORMICK re post Bentonville Mtg Rev 170222, WMT MCCORMICK nonreply fup 170328, WMT Baldwin re decision next week 170403, WMT MCCORMICK re mktg plans 170403, WMT MCCORMICK on price drop 170412, WMT MCCORMICK buyer contacts 170425, WMT China Beef ref from MCCORMICK 170703, WMT connects China on beef 170703, WMT China Zheng initial contact 170704, WMT China Zheng merch support 170707, WMT China Zheng ROM pricing 170708, WMT China beef HIGAKI intro 170718, WMT China beef HIGAKI pricing 170811, WMT China HIGAKI price quote 170811, WMT China Hgiaki Quotes Specs 170821, WMT China HIGAKI adding WO factory id 170821, WMT China HIGAKI request factory number add 170821, WMT China HIGAKI quote fup 170822, WMT China WO Status Report WMT China Beef 680 ton order 170921, WMT Chna HIGAKI re WMT contract 170924, WMT China HIGAKI re process steps 170926, WMT China Preferred Freezer initial hit 170926, WMT China Americold initial hit 170929, WMT China Cargill contact punt 171002, WMT China HIGAKI Executed WMT Contract 171010,

WMT China Update WO Team 171012,

WMT China HIGAKI China visit and update 171023,

WMT China HIGAKI re contract signature rqmt 171023,

WMT China HIGAKI re JBS Specs 171026,

WMT China HIGAKI on revised order pricing 171208,

WMT MCCORMICK on China status 171220,

WMT China re labeling 180110,

WMT China xmit manually signed contract copies 180112,

WMT China order processing timeline 180115,

WMT China HIGAKI re sked 180116,

WMT China order timing Apr 180116,

WMT China HIGAKI re factory flow charts trial shipment 180122,

WMT China HIGAKI orig signed contracts sent 180123,

WMT China CA OWB Packers delay 180131,

WMT China HIGAKI intro of SCS process 180201,

WMT China HIGAKI re OWB approval 180201,

WMT China HIGAKI SCS 180201,

WMT China Hgiaki re Cargill Tyson on China 180202,

WMT China Higki re OWB SCS audit 180202,

WMT China OWB stringout 180206,

WMT China OWB stringout 180207,

WMT China OWB stringout 180214,

WMT China OWB stall 180223,

WMT China OWB stall continues 180223,

WMT China SamsClub China dragin 180227,

WMT China HIGAKI email sig page xmit 180228,

WMT China LiqCap AZ update 180228,

WMT China PETERSEN re signed contract evidence 180301,

WMT China re post OWB to JFO 180301,

WMT China JFO inquiry 180302,

WMT China re retail link 180302,

WMT China status on China 180302,

WMT China re local China ofcs 210130,

WMT China re China of and contact history 210202,

WMT China Liao re China ofc details 210204,

WMT China on packaged cuts 210222,

WMT China docs needed 210312,

WMT China Liao re new ofcs in China 210407,

WMT China re beef purchase embargo in China 210415,

WMT China SAmerica Quote 210422, WMT China rejects BR Tradimpex case ready pricing 210426, WMT China intro to RMC China rep Jason 210428, WMT re US organic beef pgm 210605, WMT Redfield on domestic organic beef 210607, WMT Lehr Organic Beef Intro 210610, WMT re organic beef partner pgm 210615, WMT Lehr video mtg 210616, WMT Lehr re comp organic price premiums on ther products 210617, WMT Redfield cc Lehr video mtg 210617, WMT Lehr alt sales ramp 210618, WMT Lehr Baskin video mtg to come 210702, WMT Hutchins mtg set 210713, WMT Baskin Lehr call fup on pricing 210729, WMT Baskin Lehr video call 210729, WMT Partnering Zoom Call 210729, WMT Baskin on pricing 210810, WMT Baskin status inquiry 210816, WMT Baskin pass 210818, WMT Organic Beef pass 210818, WMT Organic Beef pgm not established 210823, WMT Baskin re pass pricing other issues 210824, WALMART China Retail Link Vendor application 10172-10173

# 680. RICO-42 Racketeering Violations: Fraudulent Sales and Marketing Representation 2019-2021

09-142033 180207.pdf

Presentation Fup 170222.pdf WMT SCS Audit Preferred Frzr

WMT MCCORMICK 170221 Bentonville mtg Revised

WMT Std Supplier Contract Signature Page image2018-02-

20180517 1005110267Deposit Invoice 180517.pdf

A. This pattern of sales lead development frauds and fraudulent lead reports repeats yet again in 2019-2021, conducted by defendants VENDORCO (FBI), and FOSHAN SHUNDE XinJianHan Trading Co, Ltd (RMC, CIA), with Raymond POON as principal, LONERGAN

(FBI) as intermediary both as the referral source to POON and as an alternate contact to POON after the introduction. VENDORCO through its principal, Susan WALKER (FBI), domiciled in or around San Diego, California represented one of Lead Plaintiff's companies, Winnett Cattle Company, to COSTCO. Perimeter Sales and Marketing was a sales representation firm to retail grocery fresh departments (produce and other fresh products) domiciled in California. RMC (POON, LONERGAN) is alleged to be a commercial trading operation domiciled in New York City, with a dedicated agent allegedly operating from Shanghai, China to solicit customers in China for Sheldon Beef, with progress as reported by that China-based sales agent. Lead Plaintiff also assigned sustainment of Lead Plaintiff's business entity Sheldon Beef's (Interline Exhibit 12) relationship with WALMART China so POON's entities could earn commissions through that relationship. Defendant POON and other related defendant personnel provided fraudulent sales leads and reports, facilitated by wire fraud and contract fraud, for the fraudulent purpose of stripping authentic international sales opportunities from Sheldon Beef (Interline Exhibit 12). These fraudulent services cost the company nearly two years lost for legitimate international sales opportunities. Defendant UNITED STATES also introduced an influencer MANNER who consumed time and resources in Lead Plaintiff's attempt to launch the consumer retail website for Sheldon Beef with influencer marketing.

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

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

Interline Exhibits:	4-14
Complaint paragraphs:	673-680 RICO-35-42 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-	2-0114
12120 paragraphs:	
LPEE pages (see technical note	Not applicable
on page numbering at	
paragraph 230):	
Emails and documents by topic	Manner Influencer Contract 210901,
and date, also located in LPEE:	Manner Influencer Status 210909,
	Manner Influencer re web progress status 210910,
	Manner Influencer Hold 211101,
	Perimeter Sales Mktg re brokered LA regional mkt coverage 140408
	Perimeter Sales Merchandising Pitch Deck 140408.pdfRMC LONERGAN re agent quals 200811,
	RMC LONERGAN POON mtg 200812,
	RMC LONERGAN re contract 200812,
	RMC POON Raymond Signed Contract RMC Signature
	page 200813.pdf
	RMC LONERGAN contract agreement 200813,
	RMC LONERGAN POON collaboration agreed 200814,
	RMC LONERGAN re sales activity 200830,

RMC LONERGAN re co-venture details 200831,

RMC POON coventure orgzn options 200902,

RMC LONERGAN 200903,

RMC LONERGAN re pricing 200908,

RMC LONERGAN re China Mktg 201207,

RMC LONERGAN re POON mktg direct support 201207,

RMC China direct mktg pgm 201230,

RMC POON re BRF contact inside China 210126,

RMC re BRF info request 210128,

RMC LONERGAN re COSTCO WMT on China ofc 210130,

RMC POON on BRF China mtg results 210203,

RMC re China contract mod 210225,

RMC LONERGAN on RMC sales strategy doc China 210226,

RMC LONERGAN re Berkshire pork 210307,

RMC LONERGAN re Berkshire cuts cherry picking 210311,

RMC LONERGAN re China sales progress 210311,

RMC LONERGAN Berkshire Trial Order Pricing 210312,

RMC LONERGAN re Berkshire volumes 210312,

RMC LONERGAN 210316,

RMC LONERGAN sales prospect report 210316,

RMC LONERGAN Yao Quote 210316,

RMC LONERGAN China sales quotes 210326,

RMC re signed modified contract 210331,

RMC LONERGAN beef sales quote 210413,

RMC China sales report 210430,

RMC POON on Big Sandy investment potential 210507,

RMC Jason on WMT China Intro mtg 210511,

RMC POON on status 210518,

RMC China pricing 210520,

RMC Jason on scam beef request 210525,

RMC China sales pgm conversion attempts reqd 210622,

RMC Jason re sales efforts 210628,

RMC Jason Sales Advice 210628,

RMC Jason Omasum No Quote 210703,

RMC POON re status and future pymt opptnys 210731,

RMC Jason re status 210816,

RMC POON re status 210816,

RMC re 60 day notice terminating 210902,

RMC LONERGAN re repay advances 210903,
RMC payment plan request 210903,
RMC POON re pricing guidleines 211015,
RMC Raymond re status 211220
COSTCO Walker VENDORCO HUSKEY COSTCO Final
Presentation 190501 (1) (2).pdf

### Racketeering – Dishonest Professional Services

# 681. RICO-43 Racketeering Violations: Dishonest Professional Services – Accounting Compilation And Review 1993, 2021

A. 1993: As forensically reverse engineered, CPA reviewed financial statements for Alliance were required to obtain financing allegedly available from a Vancouver, BC source as represented by CORNWELL (defendant CIA). So, Lead Plaintiff engaged the professional accountant "sister" recommended by a former Deloitte Seattle employee, Phil Walter. This individual then stopped working and abandoned this assignment during preparation (FBI, UNITED STATES), leaving the financial statement compilation incomplete after being paid for work to date. This led to protracted delays in preparation as the Lead Plaintiff was forced to spend days straightening out her mess instead of bidding projects to sustain Alliance's critically important sales and cash flow. The financial statement review process was then further dragged out by the "accountants," a local accounting firm which was actually just another defendant FBI illegal cover spying operation posing as an accounting firm. This entire defendants FBI and CIA mandated financial statement compilation and review to complete the proposed financing cost the company a substantial portion of the \$20,000 loan fraudulently advanced by Pacific Financial Services (FBI, Henry Wozow) for professional fees and expenses, which was the specific cause of Lead Plaintiff's personal bankruptcy filed in November 1993 (paragraph 653 RICO-15).

B. 2021: Defendant WEFUNDER and its officer and employees, through the various entities legally named above, whether acting on its own behalf or as spoofed by other defendants with police powers representing themselves as WEFUNDER personnel and as the actual website while acting as a defendant agent, officer, and as part of this on-going conspiracy, represented themselves, their firm, and their web platform as capable of and sincerely interested in, securing financing on behalf of Lead Plaintiff's Winnett and/or Sheldon Beef entities, thereby coordinating with and playing an on-going role in 2021 in a complex sales, production, operations, and financing scheme to deprive Lead Plaintiff and his related entities of authentic opportunities to engage interstate commerce.

C. Among their bad faith acts was defendant WEFUNDER's role in knowingly recommending an auditor, Alice CHENG, who after gathering key financial information on their behalf from Lead Plaintiff's company, refused to issue any form of the professional auditor Opinion letter required to complete the financial statements (paragraph 672B RICO-34), so the fund raising process could be undertaken as planned in conformance with SEC Regulation A+. This scenario played out almost identically to defendants' previous frauds and swindles in paragraph 659 RICO-21 undertaken by defendant ADAMSON Brothers (FBI) and in paragraph A above (CIA, FBI, CSIS, RCMP).

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

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

[	
Interline Exhibits:	Not applicable
Complaint paragraphs:	653, 672B RICO-15, 34; 681-690 RICO-43-52 generally
Appendix 2 paragraphs:	1-017
LPEE Table 2 pages 12023-	2-0053 through 2-0059
12120 paragraphs:	
LPEE pages (see technical note	Not applicable
on page numbering at	
paragraph 230):	
Emails and documents by topic	WEFUNDER MAGGARD as sponsor 210719,
and date, also located in LPEE:	WEFUNDER Solicitation fup example 1of55 sent
	210719,
	WEFUNDER MAGGARD re 2k 210720,
	WEFUNDER LABELLE re mandatory signup to vouch
	210803,
	WEFUNDER GAAP Acctnt CHENG 210902,
	WEFUNDER start sequence 210903,
	WEFUNDER GAAP Acctnt CHENG Delays 210907,
	WEFUNDER re CHENG auditor delay 210908,
	WEFUNDER GAAP Acctnt CHENG 210909,
	WEFUNDER GAAP Acctnt refuses Opinion 210909

### 682. RICO-44 Racketeering Violations: Dishonest Professional Services, Web 2021-2022

A. Defendant ENVOTEC, a website developer, located by Lead Plaintiff in Pakistan through a defendant spoofed or otherwise controlled version of website Freelancer.com, and while acting or posing as its employees and contractors, was paid for web development services. Defendants, including the funding source for this fraudulent project using cover name Michael MAGGARD, FBI Amarillo (paragraph 648 RICO-10), as an element of their on-going pattern of racketeering acts, never intend to allow these web development services to be completed and for the online Sheldon Beef store to operate and be permitted to offer products for retail sale. This was another in the series of these fraudulent interferences in interstate commerce against an online store by defendant UNITED STATES, FBI. The Lead Plaintiff had previously developed an online store on Shopify.com intended to be used to launch product sales to beef wholesalers, and which was the subject of a launch meeting with fraudulent employees Jason WASEMAN, Chris CANCHOLA, and Lori ALVAREZ in Avondale, AZ, as documented in paragraphs 686-690 RICO-48 through 52 herein, as well as in email evidence stripped and/or currently blocked by defendant UNITED STATES. Funds for web subscriptions, travel expenses and reimbursements, and other resources were expended in interstate commerce to attempt to launch this interstate commercial enterprise, as part of the attempted startup and commercialization of Gannett Peak Ranch, a now defunct Oregon corporation funded by Lead Plaintiff out of pocket.

B. This fraud and swindle is an element of defendants' on-going conspiracy to sustain, among other acts, violations, and injuries, involuntary servitude, forced labor, and human trafficking using repeated cycles of delay and financial starvation of Lead Plaintiff's business entities, and used to further their intent to exhaust the personal financial resources of Lead

Plaintiff, who regularly has and does invest personal funds and extensive amounts of personal time and professional talent in each of these entities in good faith. These expenditures in international commerce are shown at LPEE pages 10093, 10094.

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

Interline Exhibits:	Not applicable
Complaint paragraphs:	648 RICO-10, 686-690 RICO-48 through 52; 681-690
	RICO-43-52 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-	2-0001, 2-0171, 2-0172, 2-0174, 2-0176, 2-0177
12120 paragraphs:	

LPEE pages (see technical note on page numbering at paragraph 230):	10093, 10094
Emails and documents by topic	GPR website developer re feeedback 210814,
and date, also located in LPEE:	GPR Website stall 210819,
	GPR Website product load begins 210820,
	GPR website further delays 210824,
	GPR Startup Plan Rev 210829,
	GPR website closer but not functional 210903,
	GPR website slides again 210907,
	GPR website added dev fees 210909,
	GPR web dev re project hold 211026,
	GPR Web contacts zero response rate note 221117

### 683. RICO-45 Racketeering Violations: Dishonest Professional Services, Legal 1986-2005

A. Lead Plaintiff businesses and intertwined personal interests have been repeatedly deprived of honest legal services at various law firms. This trail of attorneys who did minimal or no legal work for the corporate clients Lead Plaintiff owned or worked for between 1986 and 2005 include, but sustained professional relationships include, without limitation: (i) Lazersoft - Glen GARRISON at Keller Rohrback; (ii) Alliance Environmental Services - Robert HIBBS and Susan THORBROGGER at Short Cressman & Burgess; (iii) CNA Industrial Engineering - Mike BABCOCK (also spouse of Lead Plaintiff co-worker Gwen HEATHCOTE at Deloitte Seattle); (iv) Allegent, LLC dba Performa - Michael LARSON - LARSON Hart & Shepherd, later Pivotal Law Group. LARSON was introduced by John C. T. "Jay" Conte, a federal commercial cover agent specializing in financial frauds (defendant FBI). (v) Leslie CALDWELL (defendant DOJ, cover name not recalled) at Seed & Berry, Seattle, Washington relating to intellectual property claims by Allegent LLC (which Lead Plaintiff unwittingly co-owned with PRAY as he operated undercover for defendant UNITED STATES and using its funds) against ShipNow (another UNITED STATES FBI fraudulent cover company run by Kurgan), where TARPLEY was also

noted to appear in a bank branch on an intervening retail shop floor to Lead Plaintiff's left during his multi-floor transiting escalator ride from the Fourth Avenue building lobby to the Fifth Avenue elevator lobby enroute to Lead Plaintiff's meeting regarding ShipNow intellectual property litigation with CALDWELL and PRAY at Seed & Berry.

- B. Examples of this pattern of practice of illegal general searches includes:
- 1) Corporate lawyers who act against client interests while apparently engaged for their benefit. Lead Plaintiff was not consulted prior to the removal of a cost-plus provision at paragraph 12 of the Alliance purchase and sale agreement for the asset purchase of Steve's Maintenance, including the assumption of project contracts for projects then currently underway but incomplete. THORBROGGER, the Short Cressman & Burgess attorney did not mention the removal of the cost-plus reimbursement paragraph 12 to Lead Plaintiff. Only his direct review and insistence on its return to the agreement resulted in the final agreement which included this paragraph 12. If the purposeful deletion by Susan THORBROGGER (Short Cressman Burgess, Seattle, WA, most probably DOJ, together with HIBBS) had not been noticed and returned to the document on Lead Plaintiff's insistence, this deletion would have potentially cost Alliance up to \$165,000 of lost cash flow plus approximately \$100,000 of unreimbursed costs for labor, materials, asbestos waste dump fees, and direct project overhead costs, on the Bates Vocational-Technical parking garage asbestos abatement project. This labor-intensive project required hand jack-hammering and removal of an asbestos paper interposed between the concrete finish floor and the underlying structural floor in the multi-story parking structure at Bates in Summer 1990. A \$265,000 loss would have wiped out company equity (initially \$250,000) within four months of the purchase and left the Lead Plaintiff in personal default on a \$150,000 U.S. Bank, N.A., line of credit due

to his personal guarantee with excellent personal credit. Nonetheless, defendant FBI would go on to complete the wrecking of the illegal search cover company, Steve's Maintenance. As forensically reverse engineered, this process destroyed Lead Plaintiff's company Alliance in 1993 through the use of, without limitation, as part of defendant UNITED STATES' intentional financial wrecking of Lead Plaintiff's company Alliance, which incorporated (i) fraudulent co-ownership and control through a nominee (David J. Carey as nominee, FBI, paragraphs 445-449, 649 RICO-11), (ii) fraudulent legal representation (HIBBS and Susan THORBROGGER, DOJ/FBI, both embedded at Short Cressman & Burgess law firm, paragraphs 446; 626 RGTS-6, 649, 651, 653, 683 RICO-11, 13, 15, 45), (iii) fraudulent deprivation of government benefits (SBA bonding, paragraph 446, 471; 649, 653 RICO-11, 15), (iv) theft and compromise of receivables (Steve and Kerry Brewer, FBI, paragraphs 644, 650, 651 RICO-6, 12, 13), was then succeeded by (v) a Vancouver, B.C. fraudulent financing which failed (paragraph 653 RICO-15). This was completed at the Lead Plaintiff's personal expense, including about three years of uncompensated professional labor and personal bankruptcy, for the specific purpose of destroying the Steve's Maintenance business records, thereby fraudulently concealing defendant FBI's criminal wrongdoing in its criminal investigations using this cover company.

2) The original bankruptcy case intended to be filed against LazerSoft by Lead Plaintiff and two other individuals (WATERS, TARPLEY), mysteriously resulted in absolutely no federal bankruptcy court actions or notices. With the benefit of forensic reverse engineering of defendant DOY and FBI methods, this was most probably due to HIBBS' (DOJ or FBI, Short Cressman & Burgess, Seattle, WA) actual fraudulent failure to

file this litigation when directed to do so, while acting against Lead Plaintiff's personal interest in this matter.

- 3) Extensive and expensive subsequent litigation included a federal court hearing in the US District Court for Western Washington (Judge Carolyn Dimmick) on the standing of Network Imaging Corporation, then in the process of acquiring LazerSoft assets from parent Wembley plc in this matter in 1994 or 1995, in which the Court denied standing to Network Imaging. The case was never resolved but did lead to yet another matter allegedly filed related to WATERS' ownership of the intellectual property (software work product he produced), adding still more litigation expense. WATERS reported a \$30,000 overbilling by Short Cressman & Burgess lead attorney Robert HIBBS. Most probably this too was an internal conspiracy with Lead Plaintiff's two remaining co-workers, TARPLEY AND WATERS, actually operating as members of Lead Plaintiff's defendant FBI, USMS, DOJ, CIA, ARMY minder team throughout the entire sequence in perpetuation of the illegal involuntary servitude.
- 4) A \$150,000 account receivable of a PAN subsidiary was allegedly discounted with a commercial factor in southern California. These funds mysteriously disappeared into the factor's bank, First Interstate Bank, after PAN's CEO promised to pay Lead Plaintiff compensation from that receivable (paragraphs 450-451, 601C NSEC-2; 623D, G, 627A RGTS-3, 7; 644B(iii), 650B (ii), 652G, 653H RICO-6, 12, 14, 15). The funds were allegedly seized by the bank to repay an outstanding debt of the factor to the bank. PAN CEO CORNWELL declined to take immediate action within seven days as required by California law to legally notify the bank of the actual provenance of the payment to retain the PAN subsidiaries ownership interest in the payment, so the Lead Plaintiff was once again strung

out financially as the promise of legally due compensation being paid after another delay was broken yet again by the purposeful, deliberate, and conspiratorial associated-in-fact enterprise pattern of racketeering acts by defendant UNITED STATES, FBI, CIA, and other unknown individual defendants.

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

Interline Exhibits:	4-14
Complaint paragraphs:	445-449, 450-451, 471, 601C NSEC-2; 623D, G, 626, 627A
	RGTS-3, 6, 7; 644, 649, 650, 651, 652G, 653, 683 RICO-6,
	11, 12, 13, 14, 15, 45; 681-690 RICO-43-52 generally

Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-	2-0001, 2-0056 through 2-0058, 2-0171, 2-0172, 2-0174, 2-
12120 paragraphs:	0176, 2-0177
LPEE pages (see technical note	Not applicable
on page numbering at	
paragraph 230):	
Emails and documents by topic	Not applicable
and date, also located in LPEE:	

### 684. RICO-46 Racketeering Violations: Dishonest Professional Services, Legal 2014-2021

A. Defendant Raymond SULLIVAN was introduced to Lead Plaintiff by Charles

JACKSON, a former CIA commercial cover "Merrill Lynch investment banker" who worked in

Mexico City (likely in the same timeframe as Sheriff ARPAIO while ARPAIO was at DEA).

Defendant SULLIVAN is an international trade attorney and former federal Customs and Border

Protection investigator and attorney. Defendant SULLIVAN billed entities owned and controlled

by Lead Plaintiff approximately \$400,000 for legal services between November 2013 and April

2021. He received \$10,000 paid for legal services from the funds invested by "DEAN T.

SMITH" in August 2015 and continued his services billing at \$600 per hour despite Winnett's

inability to pay as Winnett and Lead Plaintiff were continually strapped for cash flow and being

stripped of resources by the actions of defendant UNITED STATES.

B. Upon knowledge and belief, Defendant SULLIVAN was fundamentally detailed, as were prior attorneys referred by trusted sources to Lead Plaintiff and used by his business entities, for the actual purpose of spying upon and sustaining functional control of Lead Plaintiff and his related business enterprises, and to interfere with and surveil all contracts and business opportunities. These associated-in-fact enterprise racketeering acts under color of law were and are another element of defendant UNITED STATES and its co-conspirators' overall scheme and pattern of frauds and racketeering acts used to perpetuate their human trafficking, involuntary

servitude, forced labor, and invasions of human autonomy and rights in support of illegal human subject experiments and the illegal BRMT bioweapon and bioweapon delivery system.

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

Interline Exhibits:	4-14
Complaint paragraphs:	681-690 RICO-43-52 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-	2-0001, 2-0171, 2-0172, 2-0174, 2-0176, 2-0177
12120 paragraphs:	
LPEE pages (see technical note	383-384, 430-438, 440, 8370, 8371-8373, 8474, 8378, 8411,
on page numbering at	9249-9255, 9285, 9311, 9820, LPEEV65-6, 7
paragraph 230):	

Ray SULLIVAN ID incl Bar Numbers 140620.pdf Emails and documents by topic Burges Salmon 1 re London Closing 140917, and date, also located in LPEE: Burges Salmon 1 re London Closing 140918, Collins ref by SULLIVAN on Bridge Loan 150629, SULLIVAN re Benibo fake 131202, SULLIVAN Intro from JACKSON 140219. SULLIVAN on 140225 mtg 140226, SULLIVAN re Zayid investment 140304, SULLIVAN re Zayid as former Customs Investigator 140305, SULLIVAN re Mubadala Commission regmt and FCPA violation 140715, SULLIVAN WO sends \$10K 150828, SULLIVAN appointed Corp Counsel 151110, SULLIVAN on financings 160111, SULLIVAN on financing lead from CASTRO 160206, SULLIVAN on MARV Capital drop 160401, SULLIVAN re INSIGHT scam Argold, Brereton status 160419, SULLIVAN re RAM Olin contract 160426, SULLIVAN on Oliver Term Sheet to Contract 160707. SULLIVAN on AKOTO Brewer Fund creation 160710. SULLIVAN on AKOTO Brewer Fund creation 160727, SULLIVAN Draft for Oliver Funding 160728, SULLIVAN re BLACKPOOL CAP 161128, SULLIVAN re ARPAIO Palmeri Gerlach Black Rock Farms 161220. SULLIVAN ARPAIO Palmeri Black Rock Farms Jack Palmeri 161222, SULLIVAN re WMT Bentonville visit Feb 161229, SULLIVAN re Smith 5K loan 170126, SULLIVAN re Whitestone Lex Gubsky Moneywise 170126, SULLIVAN Marvel re Black Rock Gerlach 170301, SULLIVAN re Black Rock Marvel 26 Ranch reappears 170301. SULLIVAN re Marvel Black Rock retainer review 170303, SULLIVAN re pea harvester lease 170303, SULLIVAN re RAM demand notice 170401,

SULLIVAN re prospective escrow lenders 170602, SULLIVAN re CFO Smith termination 170608,

Sullian re FATCO re title for Skaar 170613, SULLIVAN TX HEC feedyard contract 180118, SULLIVAN review of E6 docs okay 180223, SULLIVAN re sales contract review 200804, SULLIVAN re ABDELSAYED 2mm loan gty shares grant 200822, SULLIVAN re RMC contract mod 26 Ranch sked 210225 SULLIVAN Billing for Feb 2019 190228.pdf SULLIVAN Billing for Jan 2019 190201.pdf SULLIVAN December 2018 Billing 190102.pdf SULLIVAN Winnett Perico Bill for April 2019 190501.pdf SULLIVAN Winnett Perico Bill for August 2018 180901.pdf SULLIVAN Winnett Perico Bill for June 2018 180701.pdf SULLIVAN Winnett Perico Bill for March 2019 190401.pdf SULLIVAN Winnett Perico Bill for November 2018 181201.pdf SULLIVAN Winnett Perico Bill for October 2018 181101.pdf SULLIVAN Winnett Perico Bill for September 2108 181001.pdf

### 685. RICO-47 Racketeering Violations: Dishonest Professional Services, MARICOPA SHERIFF, ARPAIO as Consultant 2014-2017

A. Defendant Joseph ARPAIO, as MARICOPA SHERIFF, and as a private individual acting in bad faith outside the scope of his legal authority, was instrumental in orchestrating his own introduction to Lead Plaintiff as Greg Crossgrove (ARPAIO, Interline Exhibit 5, paragraph 661C RICO-23), an organic produce farming and packing expert with prior organic farming experience in 2014 through a fraudulent resourced online search result. Defendant ARPAIO (as Greg CROSSGROVE) also then MARICOPA SHERIFF allegedly worked with Captiva Verde, an organic grower domiciled in California with a farm in Arizona funded by investors associated with the Vancouver Stock Exchange, in Vancouver, British Columbia, Canada. Crossgrove (ARPAIO) also claimed an association with the Nunes family agriculture operations in California through his brother as President of a Nunes family fresh produce enterprise. Notably,

Representative Devin Nunes, closely aligned with then President Trump and House Minority Leader Kevin McCarthy, chaired the House Intelligence Committee around this time.

B. Consultant CROSSGROVE (ARPAIO) assisted Lead Plaintiff with production methods, staffing, and locating investors, none of which came to fruition. He introduced a fellow consultant, Ricky King, Double K Enterprises, (MARICOPA SHERIFF officer) who assisted the Lead Plaintiff in touring an abandoned farming property in Hyder, Maricopa County. AZ, then currently leased from the State of Arizona by Barry Oliver, allegedly a wealthy investor (both then current or former police powers officers or agent). Defendant ARPAIO also allegedly argued about production methods and costs with another defendant police powers agent or officer, Mike CASTRO, after CASTRO (defendant FBI) was selected to become the VP Operations for WinnettOrganics, a Lead Plaintiff business entity, and conspired with PAUL SMITH (defendant FBI) then posing as embedded Winnett CFO.

C. Lead Plaintiff took a copy of a signed \$52 million investment agreement with a Qatari company, Jabor, with him to an October 2015 organic vegetable packing plant construction meeting at Willmeng Construction's otherwise empty headquarters building in Maricopa County and showed the signed document to CROSSGROVE (defendant Sheriff Joseph ARPAIO) sitting to his immediate left as they faced the video conference screen at the other end of the conference room. See LPEE pages 8489-8506.

D. Eventually, this fraud and swindle come crashing down, by defendants' deliberate and continuing interferences in interstate commerce, with the Lead Plaintiff having been run through another years-long sequence of associated-in-fact enterprise pattern of racketeering acts, false starts, false promises, frauds, and failures which began in 2013, continued with ARPAIO's direct involvement from late 2014 until a final email exchange on August 17, 2017, around the

time of his conviction on criminal contempt charges, and about a week before he was pardoned by President Trump.

E. This years-long sequence included air, hotel, and car rental expenses along with uncompensated professional labor for, among other purposes business meetings and property and facility siting and selection tours; for processing plant design meetings in Salinas, CA and Maricopa County, AZ; to meet and present information to investors; to gather with employees for tours, company project kick-off and staff meetings; as well as sales trips to WALMART (Interline Exhibits 9-10) in Bentonville, AR, and to KROGER (Interline Exhibit 8) in Cincinnati, OH; attendance at conferences and referrals by agents or officers posing as investment firms and their officers or employees in New York City; all fraudulently perpetrated over years by these defendants as they have and do interfere with and affect interstate commerce and constitutional rights. This elaborate and wildly expensive multi-jurisdiction, multi-level of government fraud and swindle, incorporating media and other private entities and individuals as co-conspirators by defendants, has been and is completely fabricated, systematically fraudulent, and has and does involve thousands of emails, phone calls, and expenditures for travel, entertainment, proposals, samples, and mailings. It is a comparable sequence to those previously undertaken by defendants to control and human traffick the Lead Plaintiff since he began directly engaging as an "independent entrepreneur" in 1983, and it is a markedly similar process to his prior business and career experiences prior to 2005 and to the subsequent ten month stint at defendant ESTABLISH for defendant ROSENBERG (first defendant FBI in Seattle, WA until June 2005, then defendant DOJ from 2005 as US Attorney in two sequential federal districts - South Texas, Eastern District of Virginia) in 2007 to 2008, which is still the final employment and earned income permitted to Lead Plaintiff by defendant UNITED STATES and its co-conspirators. See

documentary and disbursements evidence which dates from December 2014 to August 2017 referenced below.

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

Interline Exhibits:	5 specifically, 4-14
Complaint paragraphs:	661C RICO-23; 681-690 RICO-43-52 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-	2-0172, 2-0174, 2-0176, 2-0177
12120 paragraphs:	
LPEE pages (see technical note	383, 386, 427, 431, 602, 616, 632-635, 8351-8352, 8489-
on page numbering at	8506, 8813-8854, 8937-8938, 8956, 10132-10137, noting
paragraph 230):	

	entries for Arizona destinations and locations, LPEEV65-6,
Emails and documents by topic	ARPAIO Truitt inital hit connects to B Oliver 141108,
and date, also located in LPEE:	ARPAIO CROSSGROVE (ARPAIO) first hit 141212,
,	ARPAIO CROSSGROVE (ARPAIO) Persist Example 150707,
	ARPAIO from Brewer on startup plan 150810,
	ARPAIO intro Oliver 150902,
	ARPAIO on Project Progress Oliver 150906,
	ARPAIO on Plant Design Rqmts 150916,
	ARPAIO CASTRO Leases to do forgoteen during telcon 151007,
	ARPAIO availability 151014,
	ARPAIO tours Gerra Plug Power 151018,
	ARPAIO announces Captiva Salome Farm Availability 160210,
	ARPAIO on Oliver Hyder 160321,
	ARPAIO on involvement 160427,
	ARPAIO on greenhouses and financing arranged 160430,
	ARPAIO on lack of investor contact other updates 160505,
	ARPAIO King update 160511,
	ARPAIO on Oliver as poss investor 160513,
	ARPAIO on Oliver and Hyder layout 160520,
	ARPAIO on status and prior Captiva Verde involvement 160624,
	ARPAIO on Brother as Nunes exec 160627,
	ARPAIO on Oliver proposal 160703,
	ARPAIO on Oliver Term Sheet Clarification 160707,
	ARPAIO on Oliver Direct Funding 160721,
	ARPAIO on Proposed budget Oliver Hyder project 160729,
	ARPAIO on temp cooler Cowley Kodiak Produce PHX 160730,
	ARPAIO on Hyder Oliver per acre costs CASTRO 160801,
	ARPAIO info request 160805,
	ARPAIO on grow plan fin projections 160809,
	ARPAIO on Oliver deal collapse 160809,
	ARPAIO King re Hyder Oliver 160812,
	ARPAIO re Hyder Oliver resurrection 160813,
	ARPAIO on Oliver Hyder structure 160816,
	ARPAIO on Oliver Hyder 160819,
	ARPAIO on spring lettuce season 160819,

ARPAIO on Oliver Hyder prep and Buckeye 160902,

ARPAIO on acre reallocation 160906,

ARPAIO on Oliver proposal and conv cropping 160911,

ARPAIO connects RAM ACTS Freedom Famrs 160913,

ARPAIO intro ACTS Freedom Farms 160913,

ARPAIO on Oliver Hyder son objection 160913,

ARPAIO ACTS Freedom Farms and Hinson 161005,

ARPAIO on brother at Nunes and Sprouts open AZ 161008,

ARPAIO CFO Smith re plan for Hyder Oliver presnetation 161026,

ARPAIO on Oliver pitch date 161026,

ARPAIO on Western Growers Assn Pricing 161027,

ARPAIO CFO Smith re plan for Hyder Oliver presnetation 161102,

ARPAIO re WMT KROGER 161215,

ARPAIO on Gerlach NV 161216,

ARPAIO refers Gerlach Black Rock 161216,

ARPAIO re Sprouts 161230,

ARPAIO re Sprouts KROGER COSTCO WMT 161230,

ARPAIO Sheriff Term Ends 170101,

ARPAIO ref grower shipper interest 170115,

ARPAIO ref RWood Offer Letter 170115,

ARPAIO on new VP Growing referred 170117,

ARPAIO on Buckeye Greenhouses 170211,

ARPAIO on Freedom Farms reconnect 170211,

ARPAIO re phone appt avail 170216,

ARPAIO on investor closing and startup 170303,

ARPAIO re land avail and deadlines 170303,

ARPAIO 170309.

ARPAIO VP Grow comments 170309,

ARPAIO as land rep announcement 170316,

ARPAIO Prader Integrated Ag re Hyder Farms 170526,

ARPAIO on status inquiry 170707,

ARPAIO 170724,

ARPAIO on land and mkt conditions 170724,

ARPAIO 170817,

ARPAIO Prader IntegratedAG AZ hangs in 180207,

CASTRO CA VP-Ops Intvw 150825,

CASTRO CA re Mota Dir Ops add 150901,

CASTRO introduces Gerlach to DB ARPAIO 151106,

CASTRO re financings 151120,

CASTRO re Hyder Water Quality 151126,

CASTRO on Dole Gerlach 160125,

CASTRO on lettuce production detail 160214,

CASTRO on Kingman Farms status 160304,

CASTRO progress report 160427,

CASTRO re Hinson Lyle proposal via ARPAIO 160513,

CASTRO on Aqua 4D saline water trmt 160608,

CASTRO re personnel rqmts 160705,

CASTRO re Aqua 4D Giora bkfst miss and Oliver mtg 160719,

CASTRO on Aqua4D in Oliver Hyder budget 160731,

CASTRO on budget format Oliver Hyder 160801,

CASTRO on resignation 160810,

CASTRO Separation Agreement 160811,

CASTRO Separation Agreement to SULLIVAN 160811,

CASTRO connection Aqua 4D Giliad email samples 161101

DD on Oliver Term Sheet 160711,

DD Callahan (KEENE) re engement ltr 160714,

DD Callahan (KEENE) re cancelled Oliver mtg 160812,

DD on Oliver Hyder resurrection 160824,

DD Hinson on production volumes 161106,

Indeed re Galkin start 200716,

Indeed Company recruiter Indeed 200828,

Indeed re KUMIN Galkin starts 200828,

Indeed recruiter re status 201022,

King AZ ARPAIO Ops Connection 150818,

LIBERTY EB-5 initial hit 141027,

LIBERTY KELLER CARTER mtg thanks 141103,

LIBERTY EB-5 WinnettOrganics LOI 11-12-14 141112,

LIBERTY CARTER ref request services matrix request 141114,

LIBERTY re CADC TEA eligibility 150106,

LIBERTY backout excuse sent to UFIG 150505.

LIBERTY EB-5 LOI to WP 221105,

Liquid Capital AZ GOTTESMAN initial hit 170928,

Liquid Capital AZ GOTTESMAN signed app 171012,

Liquid Capital AZ GOTTESMAN on underwriting info request 171012,

Liquid Capital AZ GOTTESMAN underwriting info complete 171013,

Liquid Capital AZ GOTTESMAN email DLC sample 171017,

Liquid Capital AZ GOTTESMAN 171101 mtg request 171024,

Lyle Hinson re Buckeye Grnhses DC 161218,

Lyle re 350K Buckeye whse cooler 160818,

Oliver AZ mtg contact 150902,

Oliver re Hyder Lease 150928,

Oliver PHX Hyder Lease Sign 151004,

Oliver Hyder Eqpt Lease Dep Status 151215,

Oliver Hyder Funding update 151222,

Oliver on financings outstanding 160111,

Oliver Dole sales update 160123,

Oliver on financings status 160129,

Oliver on financings status 160208,

Oliver on financings status 160217,

Oliver on financings status 160223,

Oliver has poss investor interest 160226,

Oliver on financings status 160226,

Oliver on status 160322,

Oliver re Costamanga invest decsion postponed 160420,

Oliver update 160629,

Oliver Term Sheet Proposal 160705,

Oliver on Term Sheet Clarification 160707,

Oliver PHX mtg proposal 160713,

Oliver re mtg location ARPAIO King CASTRO Smith 160714,

Oliver 160719 mtg preview email 160718,

Oliver Term Sht mtg update to TARAZEWICH 160719,

Oliver on Hyder Budget Cost Detail 160810,

Oliver on Hyder Deal Fail 160810,

Oliver resurrects Hyder 160812,

Oliver re Hyder Dev collateral 161103,

Oliver re Hyder Dev proposal 161103,

Oliver re Hyder Farm Dev Plan 161103,

Oliver Hyder WO Presentation to Oliver 160719.pdf Oliver mtg WO ProForma Presentation V1 160719.pdf

RAM connects ARPAIO ACTS freedom farms 160913,

RAM on Hinson ACTS Freedom Farms 160914,

Rose Jordan Recruiter Fee Agreement 150824,

Smith re Oliver Term Sheet 160707,

Smith re fine tuning on Oliver financial proposal 160720, Smith re IT traceability budget add Oliver Hyder 160731, Smith re Status Report Detail on Hyder Oliver et al 160818, WMT initial hit on cold email 161002, WMT fup Baldwin 161010, WMT MCCORMICK ref from Balwin 161011, WMT sales news to WO team 161011, WMT MCCORMICK Webex 161014, WMT MCCORMICK call tomorrow email 161017, WMT MCCORMICK call fup 161018, WMT MCCORMICK call fup production volumes 161020, WMT MCCORMICK call 161109, WMT MCCORMICK re DD discussion 161114, WMT MCCORMICK resked and participant list 161114, WMT MCCORMICK call fup 161116, WMT MCCORMICK call fup 161118, WMT MCCORMICK re investors ibankers 161121, WMT MCCORMICK on contract outline 170108, WMT MCCORMICK Bentonville Mtg Attendees 170111, WMT MCCORMICK 170224 Bentonville mtg Present Draft 170123, WMT MCCORMICK email Bentonville Mtg Presentation 170123, WMT MCCORMICK Bentonville Mtg Attendees 170216, WMT MCCORMICK Bentonville Mtg Invite 170216, WMT MCCORMICK Bentonville Mtg Location 170216, WMT MCCORMICK Bentonville mtg fup 170222, WMT MCCORMICK re post Bentonville Mtg Rev 170222, WMT MCCORMICK nonreply fup 170328, WMT Baldwin re decision next week 170403, WMT MCCORMICK re mktg plans 170403, WMT MCCORMICK on price drop 170412, WMT MCCORMICK buyer contacts 170425, WMT China Beef ref from MCCORMICK 170703, WMT connects China on beef 170703, WMT China Zheng initial contact 170704, WMT China Zheng merch support 170707, WMT China Zheng ROM pricing 170708, Willmeng Jarvis Tom Contact Info 150808, WO Intent to Proceed Brewer corp apt rental inquiry

150809.

WO Team Initial Mtg LAX 150914, WO Plant Kickoff Salinas Mtg 150916, WO Plant Willmeng ref from Sayre 150917, WO Status Report ADAMSON PPM 150917, WO Team re PPM S-1 processes 150921, WO Plant Kickoff Salinas Mtg 150922, WO Plant Willmeng contract draft 151012, WO Plant Willmeng kickoff meet Oct 27 151019, WO Plant Willmeng cost workup status 151021, WO Status Report Jabor and Sales 151022, WO Hyder Farm CASTRO on Oliver 151028, WO Weekly Status Report reaction PETERSEN 151029, WO Hyder Farm Terminal Estimate to Oliver 151030, WO Sales Fresh Express Smith contact 151104, WO Grt Western Bk local takeover visit 151117, WO Team on Jabor Funded on Time 151117, WO Team re Jabor snag 151118, WO Team on financings 151120, WP Paypal Acct Detail Sep-Dec 151231, WO Team on 179mm Financings 160101, WO Status Financings 160121, WO Financings deal status to team 160208, WO Status Kingman Startup Financings 160209, WO Status Report financings 160421, WO Status re Oliver Term Sheet Verbal 160719, WO Status Final Oliver Hyder present sked 160804, WO Status Hyder Oliver rework 160818, WO Status DD Fin Sales 160929, WO Status Report on Hyder Oliver new pitch status 161006, WO on WMT progress 161018, WO Status financings 161103, WO Status Financings WMT KROGER 161115, WO Status KROGER projection incl 161226, WP Great Western 2016 DDA Account 161231, WO Org Chart 170111, WO Blitch re ofc space tour 170118, WO Status Report REED Wood join 170119, WO Team re Gerlach soi tests 170201, WO Blitch re Stockton Hill Famr tour w BLACKPOOL

170203,

WO Smith CFO re Revolution VC pass 170203, WO Status Rpt Stockton Hill Update 170209, WO Status Rpt incl WMT status 170223, WO Team re Blackppol to fund 170301, WO Team re BLACKPOOL no reply stringout 170309, WO Team re BLACKPOOL deadline miss 170310, WO Status Report DD retainer need 170320, WO also CARDONE on Status WMT others 170403, WO Team WMT dead Alb on track others 170404, WO Status Skaar 170504. WP Executive Summary Bus Plan 170507, WO Status Report Skaar Investor Interest 170515, WO Team Smith CFO Termination Notice 170612, WO Team Smith CFO Termination 170613, Zaharis re Cowley Kodiak Produce temp cooler space 170206

# 686. RICO-48 Racketeering Violations: Dishonest Professional Services, Employees, Recruiters, Various Positions 2011-2022

A. Defendants with police powers have and do electronically hack Lead Plaintiff's personal computer and the websites presented to Lead Plaintiff thereon. Defendants have and do engage in repeated blocking of access to legitimate business recruiters, repeatedly substitute their own fraudulent executive recruiters and place fraudulent employees in Lead Plaintiff owned and managed companies to arrange the hiring of defendants' own screened-in personnel and confidential informants. Defendants have and do also refer other professionals and firms as service providers for design and architectural services, and as suppliers, to supplant legitimate suppliers of plant and equipment which are essential to meeting customer needs of the various businesses which Lead Plaintiff owns, controls, and/or manages.

B. These *First* Amendment violations and associated-in-fact enterprise patterns of racketeering act mail and electronic frauds repeat many hundreds of thousands of times, including, for example, defendant police powers agents, officers, or confidential informants

Rafael GOMEZ, domiciled in California slated to be Director – Food Safety and Eric Galkin, domiciled in New York state, slated to be Director- Procurement, once permanent financing can be arranged for various entities owned and controlled by Lead Plaintiff. These and other fraudulently entered police powers personnel are recruited through online job postings on spoofed websites, and by an Indeed.com online contract recruiter. These contractors and personnel have and do continue these defendants' pattern of racketeering acts while interfering in and affecting interstate commerce and engaging in on-going entrapment attempts and entanglements of the Lead Plaintiff in other investigations in local, state, and federal interstate jurisdictions.

C. These online frauds and swindles have run from the first instance of Lead Plaintiff's use of a personal computer in the 1980s to the present for personal job hunts and for business recruiting as Lead Plaintiff has and does primarily use these online tools for this purpose while defendants, in particular defendant UNITED STATES has and does use wire fraud and email fraud, in both in-state and interstate commerce to manage the Lead Plaintiff by controlling his employment and destroying his private enterprises to perpetuate Lead Plaintiff's human trafficking, involuntary servitude, and forced labor; and their violations of the *First, Third, Fourth, Fifth, Eighth, Ninth, Thirteenth*, and *Fourteenth* Amendments, and other civil, Constitutional, and human rights under international law and ratified treaties.

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

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

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

Interline Exhibits:	Not applicable
Complaint paragraphs:	681-690 RICO-43-52 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-	2-0001, 2-0036, 2-0045, 2-0050, 2-0053, 2-0072, 2-0081
12120 paragraphs:	
LPEE pages (see technical note	371, 473, 474, 486, 544, 549, 566-573, 575-576, 599, 603,
on page numbering at	609-612, 616-765, 770-771, 783, 8479, 9181, 9820, 10179-
paragraph 230):	10186
Emails and documents by topic	Blitch re contract fertilizer packaging 170526
and date, also located in LPEE:	BREED email Offer Letter 170115,
	BREED Offer Letter 170115,
	BREED on Stockton Hill Farm Kingman 170129,
	BREED on Stockton Hill Farm offer progress 170131,
	BREED re Gila Bend lead 170131,
	BREED re Stockton Hills tour 170209,
	BREED refs VP Grow candidate 170210,
	REED Bill REED Disclosure Letter Winnett Organics
	17.01.2017.pdf
	Canchola phone number change 200727,
	CASTRO CA VP-Ops Intvw 150825,
	CASTRO CA re Mota Dir Ops add 150901,

CASTRO introduces Gerlach to DB ARPAIO 151106. CASTRO re financings 151120, CASTRO re Hyder Water Quality 151126, CASTRO on Dole Gerlach 160125, CASTRO on lettuce production detail 160214, CASTRO on Kingman Farms status 160304, CASTRO progress report 160427, CASTRO re Hinson Lyle proposal via ARPAIO 160513, CASTRO on Aqua 4D saline water trmt 160608, CASTRO re personnel rgmts 160705, CASTRO re Aqua 4D Giora bkfst miss and Oliver mtg 160719, CASTRO on Aqua4D in Oliver Hyder budget 160731, CASTRO on budget format Oliver Hyder 160801, CASTRO on resignation 160810, CASTRO Separation Agreement 160811, CASTRO Separation Agreement to SULLIVAN 160811, CASTRO connection Aqua 4D Giliad email samples 161101 CFO Smith entrap attempt backdating 161016, Galkin NYCDir Procuremnt 200824, Galkin is vehicle for procurement contacts dump 200826, Galkin fishing expedition and leave 200831, Galkin KUMIN on quote requests 200831, Galkin re termination after source strip via Indeed 200924, GOMEZ Dir Food Safety Intvw 150829, GOMEZ refers Brereton Hamilton 160407, GOMEZ re investor call request 160408, GOMEZ re investor interest 160427, GOMEZ on Costamanga mtg plan 160429, GOMEZ update on CA investor progress 160506, GOMEZ Costamanga mtg request 160508, GOMEZ re new investor leads 160512, GOMEZ investor update 160525, GOMEZ re Japanese Inv Lead sales progress 160616, GOMEZ update Kevin investor 160704, GOMEZ re Costamanga mtg 170203,

GOMEZ re Brereton has organic cattle in TX 171228, Hansen AgriPlacment Glandt refers NICKLESS 170710,

NICKLESS initial hits re 170803,

NICKLESS initial hits re Skaar 170803,

NICKLESS on status 170818,

NICKLESS sources a TX feedyard 171229,

NICKLESS re HEC Friona eqpt 180116,

NICKLESS re HEC price drop 180116,

NICKLESS re HEC LOI 180117,

NICKLESS on Rio Bravo fake finls 180213,

NICKLESS Ops re Galkin Procurement 200811,

NICKLESS Ops re Galkin Procurement contract 200811,

NICKLESS re Korea sales pgm 210116,

NICKLESS re Big Sandy 210217,

NICKLESS re Big Sandy Housing 210307,

NICKLESS on Lake County tour 210709,

NICKLESS re Intl Trader Termination 210917,

PAUL SMITH Resume 170308,

Smith CFO Stock Option Agreement Signed After

Backdating Request 10176-10178

POINDEXTER VP Sales intvw Kingman later 150826,

POINDEXTER Kingman veg crops 151001,

POINDEXTER Kingman tour Jim RHODES intro 151007,

POINDEXTER direct RHODES re Kingman 151017,

Recruiter Connections Plus DeLeon Recruiter 150903,

Recruiter Connection Plus DeLeon ref WASEMAN 150911,

Recruiter Connections Plus DeLeon submits WASEMAN 150915,

Recruiter Connections LEBLOND subord searches 150928,

Recruiter Connections Smith CFO subord 151117,

Recruiter Connections DeLeon on WASEMAN fee160229,

Recruiter Connections JBN Contingency Fee Agrmt 160414,

Recruiter Connections JBN 160414,

Recruiter Connections DeLeon update WASEMAN 160513,

Recruiter Connections JBN 160513,

Recruiter Connections Plus DeLeon 160513,

Recruiter Connections DeLeon re WASEMAN start160627,

Recruiter Connections Plus DeLeon on WASEMAN fees 170307,

Recruiter Connections Agricareers 170615,

Recruiter Connections Glandt 170630,

REED VP Ops intvw Lunch Tucson 150831,

REED re Gerlach 170127,

REED on Stockton Hill Farm Kingman 221028 170129,

REED re Stockton Hill Status 170130, REED xmits Stockton Hill Rd LOI draft 170209, REED re Black Rock visit 170304, REED to GOMEZ on Bacak Rock Farm Maps Gerlach 170305, REED on Jiim RHODES ppty 170311, REED on RHODES Peacock Highlands 170313, REED Gerlach assessment 170315, REED Gerlach Plan B Memo UTAH 170320, REED re Gerlach Assessment 170320, SBI first accesible email Canchola 200709 Task Worksheet – Brewer CEO 10179-10180 Task Worksheet – Blitch CIO 10181-10182 Task Worksheet - Smith CFO 10183-10184 Task Worksheet – Vindiola Dir HR 10185-10186 WO Blitch re ofc space tour 170118, WO Status Report REED Wood join 170119, WO Blitch re Stockton Hill Famr tour w BLACKPOOL 170203, WO Smith CFO re Revolution VC pass 170203

# 687. RICO-49 Racketeering Violations: Dishonest Professional Services, Employees, Recruiters, Logistics 2015-2021

A. Numerous defendants' police powers agents, officers, confidential informants, members of the media and other persons with privileged access have and do pose and present themselves as prospective employees of one of the Lead Plaintiff's commerce and interstate commerce business entities. While myriad persons have played such fraudulent roles, Jason WASEMAN was the only individual who requested and accepted payroll direct deposits. Two payments are made through the ADP payroll service for payroll amounts and ADP fees deposits directly to WASEMAN's personal accounts by Winnett headquartered in New Jersey, to WASEMAN then a resident of Arizona. Other fraudulent employees and potential employees had stock and stock option grants including, without limitation, CASTRO, NICKLESS, PAUL SMITH, BLITCH, CANCHOLA, REED, MOTA, CASTRO, VINDIOLA, LEBLOND,

GOMEZ, WOOD, FOLAND, REED, SULLIVAN, ARPAIO (Crossgrove), (paragraph 668 RICO-30). Note that several of these individuals also had military (DOD, ARMY, NAVY, AIR FORCE) and/or international employment (CIA commercial cover in certain instances) experience, including in military and CIA paramilitary special operations, a recurrent theme among the individuals who were assigned to employment stints with the Lead Plaintiff by defendant UNITED STATES and other defendants. These personnel were substituted by defendants including, without limitation, UNITED STATES for and consumed resources intended for use in legitimate interstate commerce in Lead Plaintiff's various private enterprises.

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

Interline Exhibits:	5
Complaint paragraphs:	681-690 RICO-43-52 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-	2-0001, 2-0171, 2-0172, 2-0174, 2-0176, 2-0177
12120 paragraphs:	
LPEE pages (see technical note on page numbering at paragraph 230):	616-765, 9256-9259, 9636-9637, 9639, 9727-9728, 9820, 9987, 9991-9993
Emails and documents by topic	Recruiter Connections Plus DeLeon Recruiter 150903,
and date, also located in LPEE:	Recruiter Connection Plus DeLeon ref WASEMAN 150911,
	Recruiter Connections Plus DeLeon submits WASEMAN 150915,
	Recruiter Connections DeLeon on WASEMAN fee160229,
	Recruiter Connections DeLeon update WASEMAN 160513,
	Recruiter Connections Plus DeLeon 160513,
	Recruiter Connections DeLeon re WASEMAN start160627,
	Recruiter Connections Plus DeLeon on WASEMAN fees 170307,
	Rose Jordan Contingency Agreement-Winnett Organics Signed 150824.pdf
	WASEMAN re Tucson ofc tour 160604,
	WASEMAN re intvw new VP Ops Bill REED 170104,
	WASEMAN re Stockton Hill Farm 170310,
	WASEMAN re WMT China logistics and fulfillment process 170926,
	WASEMAN history disappeared new email acct needed 210104,
	WASEMAN NICKLESS re Korea sales pgm 210115,
	WASEMAN ref request 210525,
	WASEMAN ref request fup 210526,
	WASEMAN checkin re WMT organic beef 210616,
	WASEMAN re cold chain fulfillment 210830,
	WASEMAN re cold chain launch timing 210830
	WASEMAN I-9 scan0010 180315.pdf
	11/10L/11/11 1-7 Scanovio 100313.pai

#### 688. RICO-50 Racketeering Violations: Dishonest Professional Services, Employees, Sales

A. Peter LEBLOND was recruited as Vice President of Sales and Marketing at WinnettOrganics in 2015, the organic fresh produce business entity managed by the Lead Plaintiff with planned operations in Maricopa County, AZ. He aggressively requested, complained, then accepted two payroll advances totaling \$7500 and claimed close relationships with senior executives at several large grocery retailers, then left Winnett before turning these commitments into sales contracts, depriving Winnett (trade name then WinnettOrganics) of his honest services while fraudulently securing financial resources through his misrepresentations. Discovery will show LEBLOND was another in the long series of carefully screened-in police power agents, officers, and confidential informants used to strip company financial resources, interfere with legitimate interstate commerce activities; and to contribute to the company's financial destruction using mail fraud, wire fraud, and other frauds and swindles in conspiracy with other fraudulent WinnettOrganics team members herein, including defendant Joseph ARPAIO in 2014-2017, while MARICOPA SHERIFF and individually.

B. Two other fraudulent cover candidates for sales and sales leadership positions introduced by defendants included William TARAZEWICH, domiciled in the Dallas, TX area slated to be Vice President of Sales and Marketing in 2016; and Brad KUMIN, domiciled in Houston, TX as a Sales and Marketing contractor also slated to be Vice President, Sales and Marketing who operated in bad faith as a sales contractor in 2020-2021 while FBI continued its long-running pattern of interferences in interstate commerce including, without limitation, fraudulent financings (paragraphs 668, 670, 672 RICO-30, 32, 34) and fraudulent domestic and international sales leads (paragraphs 673-680 RICO-35-42).

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

Interline Exhibits:	Not applicable
Complaint paragraphs:	681-690 RICO-43-52 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-	2-0001, 2-0171, 2-0172, 2-0174, 2-0176, 2-0177
12120 paragraphs:	
LPEE pages (see technical note	616-765, 8489-8506, 8715-8718, 8813-8854, 9920, 10179-
on page numbering at	10186
paragraph 230):	
Emails and documents by topic	KUMIN Ind Contr TX 200710,
and date, also located in LPEE:	KUMIN re China Supplier Search 200710,
	KUMIN re China chicken price diff 200721,
	KUMIN sales and fulfillment options 200723,

KUMIN TX re third party supplier 200724, KUMIN re ABT FL sales contract 200728, KUMIN re ABT pork 200728, KUMIN Craft re rferaal agrmt 200731, KUMIN Craft referral agrmt 200629 sent 200731, KUMIN re ABT 200801, **KUMIN ABT 200802,** KUMIN ABT pork inquiry 200803, KUMIN re Thomas Referral Contract and NCNDA 200930, KUMIN LOA announcement 201015, KUMIN re China mkt dev 201207, KUMIN takes LOA 210120, KUMIN re his status 210813, LEBLOND CA VP Sales Intvw 150825, LEBLOND re KROGER connection 150910, LEBLOND sales update 150917, LEBLOND sales update 150928, LEBLOND 5K advance 150930, LEBLOND re 2500 advance 151117, LEBLOND re status 160525 LEBLOND Hire Release Signed 160107.pdf TARAZEWICH TX re VP Sales position 160420, TARAZEWICH TX re RAM on Maines other progress 160503. TARAZEWICH TX re Maines fail others in flux 160506, TARAZEWICH TX refers ibanker 160527, TARAZEWICH TX re financing progress 160616, TARAZEWICH accepts alt employ 160706, TARAZEWICH TX loan 2500 160725, TARAZEWICH TX loan 2500 demand 170419,

#### 689. RICO-51 Racketeering Violations: Dishonest Professional Services, Employees, CFO

A. Defendant FBI police powers agent, officer, or confidential informant as DEAN SMITH, President of Mountain Pacific Machinery in Portland, Oregon" introduced his brother, "PAUL SMITH, Boulder, Colorado" in 2017 as a candidate for CFO of Winnett. Paul was selected by Lead Plaintiff based upon his resume, a phone interview, and emails. Among the

defendants' police powers agents, officers, and confidential informants posing as current or prospective employees of one of the Lead Plaintiff's private interstate commerce business entities, PAUL SMITH (FBI) was the only individual who requested back-dated stock options and then delayed signing the properly dated stock options offered for months. Back-dating is an illegal act and is an example of one more of the vast series of entrapment attempts and frauds by defendants acting under the color of law without reasonable suspicion or any sound legal basis for their actions.

B. Defendant UNITED STATES also introduced Michael Dooley from Colorado in 2011; Dennis Merck from Oregon in 2012; and through a fraudulent cover operation CFO SEARCH, Inc. and executive recruiter Michael MAGGARD introduced Ibrahim ABDELSAYED in 2021 as another CFO candidate (paragraph 478, 624D, E RGTS-4), all under false pretenses to sustain their involuntary servitude of Lead Plaintiff and thwart and conspire to thwart his numerous attempts to engage in interstate commerce.

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

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

Not applicable
478, 624D, E RGTS-4, 681-690 RICO-43-52 generally
Not applicable
2-0001, 2-0171, 2-0172, 2-0174, 2-0176, 2-0177
616-765, 10176-10178, 10179-10186
ADDELCAVED on montret 200710
ABDELSAYED on market 200710,
ABDELSAYED re status 200724,
ABDELSAYED PAINTER re loan gty 200730,
ABDELSAYED on est start dates team 200821,
ABDELSAYED re loan gty 200821,
ABDELSAYED signs loan form 200822,
ABDELSAYED 201123,
ABDELSAYED and WASEMAN Covid DB no vax appt
Bergen 210120,
ABDELSAYED re 26 Ranch 210219,
ABDELSAYED re status 210302,
ABDELSAYED pg decline 210716,
ABDELSAYED inquiry on status 211202,
ABDELSAYED re cancel email address 220114,
D Merck Stock Cert 3 121202,
Dooley Hook to EB-5 110922,
MAGGARD TX re ABDELSAYED 200722,
MAGGARD TX re ABDELSAYED start date 200817,
MAGGARD TX re ABDELSAYED 200722,
MAGGARD TX re ABDELSAYED start date 200817,
MAGGARD TX status 201015,

MAGGARD re Korea Angus pgm etc 210118,

MAGGARD re 26 Ranch and ABDELSAYED 210221,

MAGGARD on ABDELSAYED positive connect 210222,

MAGGARD re ABDELSAYED 210302,

MAGGARD re ABDELSAYED to Egypt 210304,

MAGGARD on loan docs PFS need 210306,

MAGGARD re gty and PFS 210307,

MAGGARD re Big Sandy BAFO 210322,

MAGGARD re Big Sandy reprise 210505,

MAGGARD re investors and Big Sandy 210519,

MAGGARD re Lake County LOI 210701,

MAGGARD re Lake County 210702,

MAGGARD re 500k loan 210703,

MAGGARD enroute Lake County 210707,

MAGGARD re Lake County enroute 210707,

MAGGARD re Lake Copunty tour and plus minus issues 210709,

MAGGARD re Lake County and pers FICo improvement 210715,

MAGGARD re Lake County 210719,

MAGGARD Loan to DB improving FICO 210721,

MAGGARD re Lake County 3559 LOI 210721,

MAGGARD on Lake County Fin snags 210725,

MAGGARD on WMT Wagyu comp price and other status 210804.

MAGGARD re startup sequencing plan 210816,

MAGGARD re status web dev sales 210816,

MAGGARD re add subs WEFUNDER 210817,

MAGGARD re GAAP fin need 210818,

MAGGARD re mkt gap 210818,

MAGGARD 5k GPR loan 210826,

MAGGARD re 4500 loan recvd 210826,

MAGGARD Revised GPR Startup Plan 210830,

MAGGARD re DB overadvance 210901,

MAGGARD re loan not pursued 210903,

MAGGARD re 26k loan 210909,

MAGGARD re ICPO LOI-FM-LZ-210913,

MAGGARD re Terminating Trader efforts 210916,

MAGGARD re status 211104,

MAGGARD re 700 211221,

CFO Smith entrap attempt backdating 161016,

Smith CFO Stock Option Agreement Signed After
Backdating Request 10176-10178
Smith CFO re BELLI invoices 151105,
Smith CFO re Jabor confirms xfr BkTucson rejects 151113,
Smith CFO on avoiding expenditures 151119,
Smith CFO reports CASTRO determines Jabor is scam
151119,
Smith CFO KEISER re PPM wire xfr 151123,
Smith CFO re PPM Expert Fees Paid160103,
WO Smith CFO re Revolution VC pass 170203,
WO Team Smith CFO Termination Notice 170612,
WO Team Smith CFO Termination 170613

### 690. RICO-52 Racketeering Violations: Dishonest Professional Services, Employees, Controller 2018

A. Lori ALVAREZ, an agent, officer, or confidential informant of defendants posing as an accountant contractor and prospective employee of a Lead Plaintiff business entity is paid to attend an online store kickoff meeting in 2018 in Avondale, Maricopa County, Arizona, for a web-based wholesale beef supply store, along with Chris CANCHOLA and Jason WASEMAN, also scheduled to become business entity team members. Defendant UNITED STATES blocks access to the online store and blocks or fails to deliver email business solicitations for this store around this same time (paragraph 676, 677 RICO-38, 39). See this \$854 interstate payment to ALVAREZ, an Arizona resident by Winnett, the Colorado organized and New Jersey domiciled business entity below.

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

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

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

Interline Exhibits:	5
Complaint paragraphs:	676, 677 RICO-38, 39; 681-690 RICO-43-52 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-	2-0001, 2-0171, 2-0172, 2-0174, 2-0176, 2-0177
12120 paragraphs:	
LPEE pages (see technical note	616-765, 9649, 9651, 10013
on page numbering at	
paragraph 230):	
Emails and documents by topic	Not applicable
and date, also located in LPEE:	

# 691. RICO-53 Racketeering Violations: Fraudulent Production Asset Purchase Options, Professional Services 2015-2021

A. Defendant UNITED STATES and co-conspirator defendants' frauds against the Lead Plaintiff have repeatedly caused extensive time, effort, and expenses to be incurred for interstate travel, office products, overhead, and staff expenses for professional services. These services

were used to develop concepts, process designs, and conduct plant location analysis, equipment selection and design analyses, and architectural design requiring services, travel, and other expenses by Lead Plaintiff's companies and, at times, by legitimate prospective suppliers engaged in in-state and interstate commerce. Defendant UNITED STATES holds an additional thousands of pages of documents, emails, business plans, proposals, studies, and other relevant materials dating from earlier periods to 2006 as this electronic evidence was delivered into the hands of defendant ROSENBERG at ESTABLISH in October or November, 2007. It is also probable that further paper evidence was photographed or scanned during mailing between New Jersey and Washington by Lead Plaintiff and also resides in the hands of defendant UNITED STATES.

B. Fraudulent agricultural production and processing related assets were and are listed online by defendants, who simultaneously deprived Lead Plaintiff access to actual agricultural and ranchland listings, as elements of their conspiracy to and pattern and practice of acts depriving Lead Plaintiff and his related entities of their right to pursue and benefit from commerce and interstate commerce. The overriding intent of defendants, with regard to these violations, was and continues to be, to consume the financial resources and management time of Lead Plaintiff and the entities he legally owns, controls, and/or manages. This pattern of continual interferences with constitutional rights and with interstate commerce by this associated-in-fact enterprise has recurred across time from 1968 to the present.

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

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

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

Interline Exhibits:	Not applicable
Complaint paragraphs:	691-693 RICO-53-55 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-	Not applicable
12120 paragraphs:	
LPEE pages (see technical note	See disbursements and travel at LETHL-1 and compendium
on page numbering at	2015-2021
paragraph 230):	
Emails and documents by topic	26 Ranch Clark re PPM stock swap 151016,
and date, also located in LPEE:	26 Ranch Terms Marvel 160107,
	ARTUSO re plant design 200722,
	ARTUSO on plant progression 200901,
	ARTUSO update 210409,
	BDO SLC initial contact 170727,
	BDO SLC to DD NYC connection 170807,
	BELLI intital hit 141217,
	BELLI on payment 160304,
	BELLI on investor sales progress 160608,
	BELLI on status 160811,

BELLI on organic mkt conditions 170802,

BELLI on progress lack of 180117,

Big Sandy Ranch sub debt RFQ 210314,

Bretz Hutchins on HEC E6 Double D feedyards 180120,

Bretz re E6 proof of funds conflict w investor 180208,

Burges Salmon 1 re London Closing 140917,

Burges Salmon 1 re London Closing 140918,

Caviness CS Cattle re finishing contrct potential 200901,

Caviness on plant availability for slaughter pending order 210617,

Caviness re salughter availability 210915,

CCW ARTUSO on plant design 200722,

CCW ARTUSO Case Ready Plant email to 3rd party 200807,

CCW Atruso re engrng recommendation 200811,

CCW ARTUSO on plant progression 200901,

CCW ARTUSO on plant Dematic study 210114,

CCW Artruso update 210409,

CCW ARTUSO on Dematic study 211014,

Colliers re Dev prtnr IN plant 200819,

Colliers Powers check in 220118,

Cresa Realty Advisors AZ Office Search 180904,

Dallam Cty LOI Farm HULL LOI 0001 120809,

DD on WMT Swisslog 161230,

DD re 5 yr plan to WMT 161231,

DD Callahan (KEENE) re 170124 Swisslog mtg 170109,

DD Callahan (KEENE) re Swisslog mtg 170109,

DD Callahan (KEENE) re lending DD name to WMT presentation 170126,

DD Callahan (KEENE) re Swisslog mtg fup 170126,

DD re Rabo ID Skaar 170503,

DD Skaar Site Plan Barns Winnet Site Opt 8 170509,

DD Transom re Skaar 170512,

DD on Skaar fert option 170513,

DD Skaar Barns Detail Site Opt 8 170523,

DD Fleming on DD Finl Model 170526,

DD Callahan (KEENE) re PE dilutive 170531,

DD on Skaar Organic Fertilizer Mkt Size 170531,

DD on Skaar Organic Fertilizer Plant Ops 170531,

DD on Skaar Organic Fertilizer Plant Concept Plan 170601,

DD Skaar Royal Chem CAS numbers Contract Fert Pkg 170604,

DD Skaar Site Plan 170605,

DD Skaar Site Plan Ammonia Recovery Manure 170605,

DD Skaar Organic Fertilizer Effectiveness 170607,

DD Skaar Organic Fertilizer Pricing 170607,

DD Skaar PE Investor Bid email 170607,

DD Skaar PE Investor Bid form 170607,

DD re Centerboard Housing Solution WO 170608,

DD WCC teaser draft 170608,

DD Skaar Organic Fertilizer Production Cost 170609,

DD Callahan (KEENE) re funding sked 170612,

DD Skaar Organic Fertilizer Advantages 170614,

DD WCC Pitch Deck Skaar et al 170614,

DD Callahan (KEENE) on DeSai 170616,

DD Skaar Biiding Process to SANDERS 170616,

DD Callahan (KEENE) on AXIAL lead Chatham 170619,

DD Skaar Site Plan Mods 170619,

DD NGEN fake NYC investor 170622,

DD NYC VAN BRAKEL 170622,

DD Callahan (KEENE) re AGIS NDA cmu not credible 170628,

DD Skaaar AgIS Boston 170628,

DD Skaar Advantage NDA 170628,

DD Skaar AgIS Boston 170628,

DD Callahan (KEENE) re Skaaar visit sked 170726,

DD on HIG Capital Miami 170728,

DD Skaar site visit Sander 170728,

DD JJU - Winnett Cattle Target Tracker 8 4 17 170804,

DD Skaar BDO Auditor SLC Gordon 170804,

DD Skaar BDO Auditor SLC Gordon 170807,

DD NYC Callahan (KEENE) connects to BDO SLC 170808,

DD Skaar Callahan (KEENE) Update 170809,

DD LABELLE Teton County 240 Tour Pass 170810,

DD Skaar Cost per pound gain 170811,

DD Skaar LOI xmit 170811,

DD Skaar LOI signing 170821,

DD Skaar past contacts 170821,

DD Skaar Teton River Farm Feeney email 170822,

DD Skaar rcv Alt Offer 170828,

- DD Skaar Teaser 170905,
- DD Callahan (KEENE) re no progress 170906,
- DD Skaar Site Plan Barns Winnet Site Opt 8 170509,
- DD Transom re Skaar 170512,
- DD on Skaar fert option 170513,
- DD Skaar Barns Detail Site Opt 8 170523,
- DD Fleming on DD Finl Model 170526,
- DD Callahan (KEENE) re PE dilutive 170531,
- DD on Skaar Organic Fertilizer Mkt Size 170531,
- DD on Skaar Organic Fertilizer Plant Ops 170531,
- DD on Skaar Organic Fertilizer Plant Concept Plan 170601,
- DD Skaar Royal Chem CAS numbers Contract Fert Pkg 170604,
- DD Skaar Site Plan 170605,
- DD Skaar Site Plan Ammonia Recovery Manure 170605,
- DD Skaar Organic Fertilizer Effectiveness 170607,
- DD Skaar Organic Fertilizer Pricing 170607,
- DD Skaar PE Investor Bid email 170607,
- DD Skaar PE Investor Bid form 170607,
- DD re Centerboard Housing Solution WO 170608,
- DD WCC teaser draft 170608,
- DD Skaar Organic Fertilizer Production Cost 170609,
- DD Callahan (KEENE) re funding sked 170612,
- DD Skaar Organic Fertilizer Advantages 170614,
- DD WCC Pitch Deck Skaar et al 170614,
- DD Callahan (KEENE) on DeSai 170616,
- DD Skaar Biiding Process to SANDERS 170616,
- DD Callahan (KEENE) on AXIAL lead Chatham 170619,
- DD Skaar Site Plan Mods 170619,
- DD NGEN fake NYC investor 170622,
- DD NYC VAN BRAKEL 170622.
- DD Callahan (KEENE) re AGIS NDA cmu not credible 170628,
- DD Skaaar AgIS Boston 170628,
- DD Skaar Advantage NDA 170628,
- DD Skaar AgIS Boston 170628,
- DD Callahan (KEENE) re Skaaar visit sked 170726,
- DD on HIG Capital Miami 170728,
- DD Skaar site visit Sander 170728,
- DD JJU Winnett Cattle Target Tracker 8 4 17 170804,
- DD Skaar BDO Auditor SLC Gordon 170804,

DD Skaar BDO Auditor SLC Gordon 170807,

DD NYC Callahan (KEENE) connects to BDO SLC 170808,

DD Skaar Callahan (KEENE) Update 170809,

DD LABELLE Teton County 240 Tour Pass 170810,

DD Skaar Cost per pound gain 170811,

DD Skaar LOI xmit 170811,

DD Skaar LOI signing 170821,

DD Skaar past contacts 170821,

DD Skaar Teton River Farm Feeney email 170822,

DD Skaar rcv Alt Offer 170828,

DD Skaar Teaser 170905,

DD Callahan (KEENE) re no progress 170906,

DD Skaar SANDERS tours Frank MAUGHAN BDO 170913,

DD Skaar Sander re Kritser 170921,

DD Skaar SANDERS on revised structure 170929,

DD Skaar SANDERS Update 171013,

DD Skaar SANDERS re Kritser Friona Ind ExCEO call 171022,

DD Skaar WMT China ND Rep Sr Legislator BANCO Advisors 171024,

DD Skaar Revised Buyout 171112,

Dematic Proposal to WASEMAN 161228,

Dematic 200720,

Dematic 200806,

Dematic 200806,

Digested Organics WO Proposal 1 page DD 170531,

Digested Organic 1 pager 170601,

Digested Organic on processing cost per gallon 170609,

Digested Organic liq fert offering 171107,

Digested Organic liq fert offering referrals 171116,

Euro pig trailers 210427,

Feedex UAE Export Quotes ref from Phillips 201209,

Feedex Phillips update 210224,

Feedex re their catalog our volumes 210312,

Feedex update 210420,

Feedex re organic dairy in Earth TX 210604,

Freelancer disappearance on Chinese beef label 210907,

Full Circle Compost Cody Witt Invoice 170331,

G3 Vancouver BC Terminal Transit for AGI Quote Request 211130,

Gearn Ibach on HEC feedyard 171231,

Gearn Ibach on state of HEC feedyard 180104,

Gearn Ibach NICKLESS re HEC design reconfig 180118,

Gearn Ibach HEC design discussion 180119,

Gearn Ibach re halt work as HEC gone 180126,

Google Ads circular response to initial ban info request 210805,

Hartman re GROSS organic mkt research inquiry 210520, Hartman re refs and experience 210525,

Hartman Group re Organic Mktg Study for GROSS Mark 210603,

Heuer MO on timing 200720,

JBS WILLIAMS Organic Beef 170523,

JBS on Natural Cattle Production Projection 170530,

JBS re natural program for customer 170818,

JBS WMT is customer for JBS program inquiry 170818,

JBS Stevens re WMT China natural cattle processing Hyrum 171002,

JBS Hyrum Rawlings 171108,

JBS Rust re plant slaughter capacity 210116,

JBS Bradbury re slaughter pgm 210119,

JBS chicken pork quote requests 210126,

JLL Sayre AZ check in 170926,

LONERGAN re BRF China 210125,

Luckhart pig trlr quote request 210428,

Luckhart pig trlrs and transport 210428,

Lux re virtual ofc svcs 161021,

Lux ofc switch WASEMAN 161022,

Lux 1 of many credit card decline 170301,

Lux DB advances rent Indian School Rd 180206,

Lux AZ re rent Indian School Rd 180301,

Marchal Semple CPA AZ 160125,

Mijajlovic acctnt re billing 200804,

Mijajlovic re deferral of billing 210325,

Mijajlovic re no response email acct delete and status 210831,

Mijajlovic checkin 220222,

MO Contract Farmer Heuer 200921,

OWB Brandt intro to Summers 180123,

OWB Summers Korea Angus pgm 201214, OWB Korea suspension reply 201223, OWB Korea beef pgm 201226, OWB Summers slaughter availability 210116, OWB Summers Quote Request 210321, OWB re Utility Cattle for China 210609, OWB Summers Req 6 for deboning cost 210620, OWB Summers apology re telcon 210621, Oxbo Eqpt PO 1004 from Winnett Perico Inc 170303, Oxbo Eqpt WP PO 170303, Oxbo Smith PO for 170306. Portable Vac Coolers Inquiry 160216, Royal Chem re organic liq fert 170530, Royal Chemical email price quote 170721, Royal Chemical drop on True misinformation 170723, Ryder re financing plan 160317, Ryder Nichols VP Sales Ramsey mtg 161201, Ryder Aquilino re startup sequence fin 161208, Sayre BELLI re Jabor scam 151119, Sayre AZ check in 170926, Southern Vacuum Coolers Inquiry 160216, Stampede Meats delay sales reply 4MM pound opptny 210317, Stampede Meats retail prepack RFQ 210317, Stampede Meats retail prepack RFQ questions 210319, Stampede re WMT China pricing reaction 210426, Sterling re further process beef 201226, Sure Fresh re bean processing 170309, Swisslog automation Jennings NYC in house 161101, Swisslog automation Jennings NYC in house 161107, Swisslog automation Jennings NYC in house 161205, Swisslog to WASEMAN re automation 161228, Swisslog Jennings re DD mtg and progress 170113, Swisslog re NYC meeting notes and fup 170126, Swisslog Deck DD mtg to WO team members 170128, Swisslog developer search 170316, Swisslog referral developer 170331, Swisslog ref Developer on PPDC costs 170402, Swisslog Dev Chain Berger 170405,

Swisslog re ASRS investment 170515,

Symbrosia Etzioni re methane reduction cattle trial 210731,

Symbrosia re LITIGATION transition 210928,
True Fert re org fert samples 170719,
Tucson Intel Ofc re temrination 161020,
Tyson chicken re China no availability, alt pork contact 210201,
Tyson re China mkt 180205,
Uddermatic Martin re Uddermatic 180202,
Uddermatic cutout 180206,
Uddermatic feeding rates 180217,
WestCoastPrime reatil prepack quote request 210313,
Willmeng Jarvis Tom Contact Info 150808,
Winnett Initial Property Search Email to Espy 110627

### 692. RICO-54 Racketeering Violations: Fraudulent Production Asset Purchase Options, AZ 2015-2017

A. Defendants initiated their Kingman Farms and Stockton Farms fraudulent sales and financing frauds in 2015 as Lead Plaintiff discovered the agricultural production asset acquisition opportunities they had planted online to acquire around 8,000 acres of irrigated farmland near Kingman, Arizona. This land would have supported Lead Plaintiff's planned organic produce production operation, WinnettOrganics (Winnett), a project then in sales and supply negotiation with defendants WALMART (Interline Exhibit 9) and MCCORMICK, among others. This elaborate fraud engaged several defendant FBI agents, across Las Vegas, NV, Kingman, AZ, and Phoenix, AZ who served as fraudulent Winnett employees, as realtors; and as Las Vegas real estate developer, James Rhodes, likely then suspected of bank fraud, financial fraud; as well as a tangentially related drug trafficking investigation involving employees of the Stockton Hill, Kingman, AZ farm's lessee operator indirectly disclosed by REED (FBI).

B. Defendants' fraudulent misrepresentation of an authentic asset sales and the alleged availability of owner financing for both Stockton Hill and Kingman Farms, and their entrapment

scheme failed in 2017 after many months of fraudulent scenarios and variations to be recounted at trial and on the emails and documents cited in this paragraph below. A financing allegedly available through defendant Jonathan CROSS related entities commonly known as BLACKPOOL and SHEFFORD, and allegedly with the participation of TIAA/CREF, a large scale pension and retirement funds manager failed. The Kingman Stockton Hill Farm deal collapsed after a series of delays, twists, turns, and more lies were piled upon the defendants' vast pile of lies, misrepresentations, and frauds. This complex sequence involved New York based defendant entities BLACKPOOL/SHEFFORD and DOMINICK, an Arizona and Nevada based realtor team (BROADWAY, VOLK), the Las Vegas Nevada based real estate developer (RHODES), and a Boston, Massachusetts based investor and former investment partner and land co-owner (represented by its officer SAUL), a one time a co-owner of a still larger farm with the Las Vegas developer (RHODES). Wire fraud, fraudulent offers of financing, and travel expenses paid by Winnett were used to perpetuate this sequence of human trafficking, involuntary servitude, and forced labor, while asset stripping and entrapment efforts continued.

D. Fraudulent agricultural production and processing related assets were and are furnished, by defendants, while simultaneously depriving Lead Plaintiff access to alternative sources, as elements of their conspiracy to and pattern and practice of acts depriving Lead Plaintiff and his related entities of their right to pursue and benefit from commerce and interstate commerce. The overriding intent of defendants, with regard to these acts, violations, and injuries was and continues to be, to consume the financial resources and management time of Lead Plaintiff and the entities he legally owns, controls, and/or manages.

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

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

Interline Exhibits:	Not applicable
Complaint paragraphs:	691-693 RICO-53-55 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-	Not applicable
12120 paragraphs:	
LPEE pages (see technical note	Not applicable
on page numbering at	
paragraph 230):	
Emails and documents by topic	Broadway AZ 16K acres Hyder 161005,
and date, also located in LPEE:	Broadway AZ likely cutout msg 161006,
	Broadway Kingman Red Lake info 161020,
	Broadway KJV re BLACKPOOL CROSS sked arrival
	170203,
	Broadway KJV re SAUL and Barings availability 170209,
	Broadway KJV re Stockton Hill Loans 170212,

Broadway KJV re well drill sub Stockton Hill Loans 170213, Broadway KJV xmit NDA dataroom access 170214, Broadway KJV escrow and psa to be drafted 170301, D Brewer Air Itenerary EWR PHX Hold for Anglade EWR 150830.pdf D Brewer Car Rental Itenerary EWR PHX Hold for Anglade EWR 150830.pdf D Brewer FS for SBI Surety Bond 413-NEW-as-of-7-30-2018 180730 .pdf D Brewer Hotel EWR PHX Hold for Anglade EWR 150830.pdf D Brewer Hotel Tucson EWR PHX Hold for Anglade EWR 150830.pdf D Brewer US Airways EWR PHX EWR 150830.pdf Kingman Land Swap status inquiry 160219, Kingman land legal des request 160223, Kingman Farm land swap 160224, Kingman Land Swap status 160224, Kingman Farms deal structure revision 160229, Kingman Farms RHODES discussion confirm 160229, Kingman status to team 160303, Kingman Farms deal structure revision 160304, POINDEXTER VP Sales intvw Kingman later 150826, POINDEXTER Kingman veg crops 151001, POINDEXTER Kingman tour Jim RHODES intro 151007, POINDEXTER direct RHODES re Kingman 151017, Oxbo Dump Carts WP PO 1008 170306.pdf Oxbo Eqpt email

Purchase Order 1004 from Winnett Perico Inc 170303.pdf

Oxbo Quote Winnett Organics 2475 x3 rev. 03.02.17 (2) 170306.pdf

SAUL Barings Stockton Hill WO LOI RLV 170215,

SAUL Stockton Hill WinnettOrganics LOI RLV 170215,

SAUL re Stockton Hill Farms Structure 170217,

SAUL Barings revise Stockton Hill WO LOI RLV 170218,

SAUL Barings re LOI rev plans 170220,

SAUL Barings status on BLACKPOOL financing 170224,

SAUL Barings moving ahead BLACKPOOL financing 170301,

SAUL Barings re sked pressure on fin 170303,

SAUL to Fiera Comox 170804,

SAUL JV Structure incl Teton Valley Farm 170929,
SAUL re Skaar Purchase Leaseback 170929,
SAUL Barings WO Revised LOI Stockton Hill Farm 170218.pdf
Zaharis re Cowley Kodiak Produce temp cooler space 170206

# 693. RICO-55 Racketeering Violations: Fraudulent Production Asset Purchase Options, OR, ID, TX 2015-2021

A. Defendants have repeatedly misrepresented farms and ranches as available properties for purchase by Lead Plaintiff business entities as part of their scheme to keep Lead Plaintiff engaged in expending time and financial resources to develop the productive capacity of his planned organic agriculture businesses. Among other elements, this includes presenting actually unavailable properties as available for purchase. One of these fraudulent sales was a 3559 acre ranch in Lake County, Oregon, presented by defendants (HUTCHINSON, AMSBAUGH, FBI). Lead Plaintiff spent more than \$700 to travel to and inspect this property. The specific emails and travel records related to this trip are currently blocked by defendant UNITED STATES, but a signed Letter of Intent is included in the evidence presented at the table below.

B. The outbound trip to Lake County, Oregon via Kennedy Airport, NYC to Seattle-Tacoma Airport near Seattle, WA, then to Redmond Airport, Redmond, OR for ground transportation to Lake County, OR by defendants' agent or officer (operating undercover, unknown to Lead Plaintiff at that time) included a thunderstorm delay and missed connection, forcing a late arrival and very brief overnight stay near Sea-Tac. See LPEE page 10095, noting disbursements on (yymmdd) 210706 Delta \$534.40, 210707 JFK \$22.90, 210707 Motel 6 \$2121.54, 210708 Africa Lounge \$23.81, SEPTA \$9.25.

C. Other email and wire predicate frauds of agriculture real estate and production facilities and related financing options include, for example, Julian Bros Sheep Ranch, Boulder,

WY fraudulent ranch sale listing as Big Sandy Ranch, in 2021 sale brochure and 2023 New York Times article at LPEE pages 10750-10771, and "LABELLE" emails listed below.

D. Fraudulent agricultural production and processing related assets were and are furnished, by defendants, while simultaneously depriving Lead Plaintiff access to alternative sources, as elements of their conspiracy to and pattern and practice of acts depriving Lead Plaintiff and his related entities of their right to pursue and benefit from commerce and interstate commerce. The overriding intent of defendants, with regard to these violations, was and continues to be, to consume the financial resources and management time of Lead Plaintiff and the entities he legally owns, controls, and/or manages.

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

Paragraph 638 subparagraph D RICO-1 is incorporated herein by reference. Paragraph 626 RGTS-6 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at

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

Interline Exhibits:	Not applicable
Complaint paragraphs:	691-693 RICO-53-55 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-	Not applicable
12120 paragraphs:	
LPEE pages (see technical note	10750-10771, 10095, noting disbursements on (yymmdd)
on page numbering at	210706 Delta \$534.40, 210707 JFK \$22.90, 210707 Motel 6
paragraph 230):	\$2121.54, 210708 Africa Lounge \$23.81, SEPTA \$9.25.
Emails and documents by topic	26 Ranch Clark re PPM stock swap 151016,
and date, also located in LPEE:	26 Ranch Terms Marvel 160107,
	Broussard re Lake County fin 210710,
	Colliers re Dev prtnr IN plant 200819,
	Colliers Powers check in 220118,
	Cresa Realty Advisors AZ Office Search 180904,
	Dallam Cty LOI Farm HULL LOI 0001 120809,
	Eslabon Bretz Executed Winnett Cattle CA 12-22-17
	171221.pdf
	Grasse Long Realty 160601,
	Grasse re properties search 160630,
	Guitierrez Ranch LOI Signed140130,
	HEC feedyard email contract 180118,
	HEC feedyard NBH cattle loan 180119,
	HEC Feedyard NBH re loans 180119,
	HEC water lease contact 180119,
	HEC Bretz re Double D issues 180120,
	HEC Rio Bravo agrres to share fin data 3yr 180123,
	HEC contract redraft fm SULLIVAN 180124,
	HEC returns to mkt per NICKLESS 180212,
	HEC and E6 Blitch re workflow 180218,
	HEC E6 calf barns quote 180219,
	HEC E6 calf barn eqpt 180221,
	HEC E6 calf milk pasteurizing plant 180222,
	HEC E6 note sale to Summit 180222,
	HEC E6 Calf hutch housing option 180223,
	HEC E6 Calf barn floors 180228,
	HEC feedyard contract SKMBT_C654e18011814500
	180118.pdf
	IntegratedAg initial web hit Prader 170516,
	LABELLE MJ hold add Big Sandy 210216,
	LABELLE re Big Sandy cmsn split w Theo list agt 210218,

LABELLE on Big Sandy Rejects First Offer 210222, LABELLE re contract for deed 210224, LABELLE on Big Sandy deal structure 210226, LABELLE re Big Sandy botton line from Theo 210301, LABELLE Big Sandy basic title info 210304, LABELLE on Big Sandy Ranch MAGGARD gty 210305, LABELLE re Big Sandy 210310, LABELLE re New Mexico comp AU pricing 210310, LABELLE Big Sandy BAFO 210317, LABELLE on Big Sandy BAFO DB reaction to rejection 210324, LABELLE re Big Sandy BAFO response to Theo comments LABELLE on Theo ping Big Sandy 210415, LABELLE re Theo and Big Sandy new interest 210506, LABELLE on Big Sandy structure and deal quantitties 210508, LABELLE re Theo Pearson Big Sandy behavior 210510, LABELLE on broker comments and Big Sandy 210514, LABELLE Big Sandy delay and deficient reply pattern LABELLE Pearson re Big Sandy deficient communications 210517, LABELLE Big Sandy drop 210617, Lake County 3559 Appraisal 210322, Lake County Appraisal 210322, Lake County OR Brandon 210627, Lake County Gannett Peak Ranch Mid-Case Business Plan 210628, Lake County OR Offer Mod 210629, Lake County Opptny Zone Investments cold email 210630, Lake County LOI 210702, Lake County Due Diligence folder link 210703, Lake County tour fup 210708, Lake County Creek Fishway project 210709, Lake County plant siting opptny zone 210710, Lake County 3559 Mike MAGGARD PFS 210712, Lake County Opptny Zone seller options 210712, Lake County seller re stock v loan 210713, Lake County Binding PurchSale Agrmt 210714, Lake County Prelim title report request 210719, Lake County Loan Options Disappear Ex 1of11 210725 Lake County 3559 AC MOL Signed LOI 210701.pdf Lake County 3559.45 Brochure.pdf LOI Farm Dickson Final 121211.pdf Marvel 26 Ranch rejects structure 160122,

Marvel re Black Rock Famrs deal 170303,

Nelson on dropping Yreka CA ranch no water 210614,

Oppliger via Abacherli 180130,

Oppliger Abacherli drops out 180209,

Oppliger Abacherli ref to McDowel 180228,

Renfrew CA Ashurst Ranch into escrow 210312,

Royal Chemical Price Qte Org Fert Pkg 170721.pdf

SBI team on Big Sandy BAFO deal fail 210324,

SBI Team on Lake County 210701,

SBI team on Lake County fin WMT mtg 210715,

Skaar SANDERS Swan 170419,

Skaar Winnett Cattle Company LOI Skaar 170429,

Skaar Pitch Deck 170512,

Skaar Sales Brochure 170512,

Skaar JBS WILLIAMS on Organic Beef 170523,

Skaar Teton River Ranch Broker ref Rumsfeld ref 170523,

Skaar Barns 170530,

Skaar Steam Flake Plant Cost Est Gearn 170530,

Skaar Jeffereon Cty ID on Skaar Expansion 170731,

Skaar Poulsen CPA appt 170731,

Skaar WF Id Falls Kay Burke and SANDERS 170809,

Skaar ID Dept of Ag rqmts 170810,

Skaar outreach - US Bank reply delay arrange cutout 170817,

Skaar Sander re US Bank established relationship 170817,

Skaar Teton River Ranch Broker Feeney 170822,

Skaar AGR interest initial hit 170828,

Skaar Kritser Ranch Creek WA initial hit 170829,

Skaar ClearLight initial hit 170905,

Skaar Harris WILLIAMS re AGR 170906,

Skaar SANDERS on strong interest Kritser Ranch Creek 170907,

Skaar WF Id Falls Luke on sub debt 170915,

Skaar Teton River Ranch Broker sale fail price drop Feeney 170925.

Skaar Teton River Ranch Broker Feeney connects RL Holdings 170929,

Skaar Teton River Ranch Broker Halgerson 171002,

Skaar Kritser WA advisor John Herring Friona Ind 171030, (see also LPEE page 1074V, entries 9/7/2017 and 10/30/2017)

Skaar deal dead Gerra 171208,

Skaar SANDERS on alt buyer LOI 180124,

Turpin Feedyard Purch Agrmt144454 190703.pdf

WILLIAMS LOI Dallam Cnty 800ac Farm HULL LOI

0001.pdf

Zeman Ranch 2 NE on famr sales process and investors
210605,
Zeman Ranch broker discussion re investors 210605.

# **LETHALITY ATTEMPTS (LETHL** series offenses)

694. LETHL-1 Lethality Attempts: British Columbia Sea to Sky Highway BRMT Melatonin Overdose, Mid 1980s

A. Lead Plaintiff was deliberately overdosed with melatonin to induce intense sleepiness while driving on the BC Highway 99 Sea-To-Sky highway south of Squamish, British Columbia, Canada near Porteau Cove by defendant UNITED STATES (CIA and/or ARMY) in approximately 1983. The Lead Plaintiff and his first spouse Lynne were together in the vehicle traveling south at about 50 to 60 miles per hour approximately eight feet from the unguarded edge of an 80 to 110 foot cliff adjacent to Howe Sound. Both would have been severely injured or killed if the Lead Plaintiff had failed to stop before being overtaken by the BRMT melatonin overdose in early afternoon after a full night of sleep. The evidence as to the specific date, time, and remote illegal BRMT instructions provided across the cell phone network to the cellular telephone equipment box in the vehicle's trunk which concealed the local BRMT bioweapon and bioweapon delivery system inside, which provide specific evidence of this event are likely to be available upon further investigation and discovery against defendants. Known iilegal BRMT program, rights, and associated-in-fact enterprise racketeering principals in the region at this time were defendants WEISSMAN, ROSENBERG, HOPPER, and most probably BURNS who was not known to have been met under any cover by Lead Plaintiff until 1986, when he was introduced by STONE at LazerSoft as one of its Board members along with GARRISON, DeBon, and HOPPER, as Lead Plaintiff was trafficked from Deloitte Seattle to become

LazerSoft CFO. Bannon and THORPE were also employees at Deloitte Seattle and Zoulas at Westin during this period. REICHERT and BOYLE were senior officers at defendant KCSD during this period.

B. Defendant UNITED STATES most probably employed this method of extreme BRMT abuse to orchestrate the murder of Audrey Brewer in September 2011 (paragraph 10) using a physically and emotionally abused female intermediary as the direct perpetrator who acted in apparent extreme rage under the direct influence of the illegal BRMT bioweapon and bioweapon delivery system, which biochemically hijacked her pineal gland to provoke an extreme adrenaline level (fight or flight hormones), and the knife slashing attack which resulted in Audrey Brewer's death from the slashing of her carotid artery in her neck. The female perpetrator had absolutely no history of violence at any time but was also being psychologically provoked by the manipulative male who was involved in relationships with both females at various times. The psychological abuse of the apparent perpetrator was used in the moment as the concealment which hid the actual BRMT perpetrator of the extreme biomedical manipulation from view and exposure, since the illegal BRMT bioweapon's mere existence is highly classified, no comparable was previously known in human history, and BRMT operation leaves no trace evidence as it is a series of carefully focused energy pulses absorbed into the brain. This momentary sense of extreme rage which was most probably experienced by the knife wielder is comparable to the momentary biochemical rage induced in Lead Plaintiff during an unrecorded incident adjacent to Lead Plaintiff's residence between August 2008 and October 2010 in Cliffside Park, NJ and by the illegal BRMT bioweapon in the Tunnel Flash Incident documented at paragraph 619 HEXP-16, LPEE pages 11668. The intent of defendant UNITED STATES in orchestrating this process against US persons would have been and would be to

facilitate its future deployment against others which it targets for assassination (paragraphs 803, 805).

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

Interline Exhibits:	Not applicable
Complaint paragraphs:	10, 608, 609, 619 HEXP-5, 6,16; 626, 629, 630 RGTS-6, 9,
	10; 639 RICO-1; 694-710 LETHL-1-17 generally
Appendix 2 paragraphs:	1-001A
LPEE Table 2 pages 12023-	2-0026
12120 paragraphs:	
LPEE pages (see technical note	1 et al, 11-139, 140 et al, 413-415, 416-418,419-426, 542-
on page numbering at paragraph	547, 564-574, 598-606, 766-769, 772-773, 774-785, 786-
230):	793, 9679-9696, 9875, 10187-10250, 10302-10304, 11656-
	11664, 11668, LPEEV65-1

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

D. These schemes and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v.* Reynolds, 345 U.S. 1 (1953). Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to these Lethality Attempts series subcounts at paragraphs 697 through 710 follow:

Interline Exhibits:	15, 15C, 15D
Complaint paragraphs:	10, 462-469, 471-473, 499-500, 502-503, 511-512, 516-521, 527B; 600, 602, 603 NSEC-1, 3, 4; 604-609, 611, 614, 615, 616, 617-620 HEXP-1-6, 8, 11, 12, 13, 14-17; 626, 629-636 RGTS-6, 9-16; 639, 641, 642 RICO-1, 3, 4; 695, 699-701, 703, 705, 706-710 LETHL-2, 6-8, 10, 12, 13-17
Appendix 2 paragraphs:	1-001A, 1-001C, 1-001D, 1-001E, 1-032, 1-056, 1-058, 1-059, 1-064, 1-065, 1-066, 1-067

LPEE Table 2 pages 12023-	2-0026, 2-0076, 2-0099, 2-0115, 2-0117, 2-0150, 2-0158,
12120 paragraphs:	2-0188, 2-0193, 2-0194. 2-0196, 2-0202, 2-0203 through
	2-0215, 2-0217
LPEE pages (see technical note	1 et al, 140 et al, 413-415, 416-418, 419-426, 542-547,
on page numbering at paragraph	564-574, 598-606, 766-769, 772-773, 774-785, 786-793;
230):	794, 1074V (10/31/2017 entry), 9679-9696, 9875, 10187-
	10250, 10302-10304, 10306-10310, 10614-10619, 10620,
	10631, 10637, 10639, 10653, 11656-11664, 10672,
	10694-10736, 10737-10738, 10739-10744, 10745-10747,
	10748-10749, 11668, 12160-12244, LPEEV65-1, 2, 13-16
Emails and documents by topic	Certain emails are currently blocked by a defendant
and date, also located in LPEE:	UNITED STATES computer hack

#### 695. LETHL-2 Lethality Attempts: Washington State BRMT Induced Falls, 1990-2005

A. While a resident of the state of Washington, Lead Plaintiff was subject, between approximately 1990 and 2005, to a series of unexplained falls which were caused and created by defendant UNITED STATES or its agents, including at his 149<sup>th</sup> Street, Kirkland, WA residence across the street from the BURNS residence, during and after BURNS residency there. These losses of balance and equilibrium falls caused the Lead Plaintiff to tip backwards while remaining in a completely erect posture, tipping him as if a statue, and created serious risks of severe injury or death. These falls were initiated while the Lead Plaintiff was hiking alone near Stevens Pass, climbing a ladder to the roof of his home in Kirkland, standing on living room scaffolding during construction, and under other circumstances not currently recalled. The evidence as to the specific date, time, and remote BRMT instructions which are given to initiate each event are likely to be available upon discovery against defendant UNITED STATES.

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

development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 694D LETHL-1 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	615, 617 HEXP-12, 14; 694-710 LETHL-1-17 generally
Appendix 2 paragraphs:	1-001C
LPEE Table 2 pages 12023-	2-0076
12120 paragraphs:	
LPEE pages (see technical note	140 et al, 419-426, 774-785
on page numbering at paragraph	
230):	
Emails and documents by topic	Certain emails are currently blocked by a defendant
and date, also located in LPEE:	UNITED STATES computer hack

696. LETHL-3 Lethality Attempts: Washington State BRMT Induced Suicide Ideation, 2003-2005

A. In the aftermath of the precursor and successor events related to the 9/11/2001 terrorist attack, and as defendant REICHERT moved from Sheriff at defendant KCSD to Congress, defendants DOJ, FBI, CIA, ARMY, ROSENBERG, FAUCI, and unknown others maneuvered systematically and decisively to destroy Lead Plaintiff's fraudulently orchestrated

and managed marriage to Jeanette and all potential sources of personal income. While a resident of King County, Washington, Lead Plaintiff was subject between approximately 2002 and 2005 to intense, torturous BRMT manipulation of brain biochemistry, and to on-going coercive psychological abuse by visual and electronic means, which defendant UNITED STATES, DOJ, FBI, CIA, ARMY, FAUCI, NIAID, ROSENBERG, CALDWELL, PRAY, MUELLER, and unknown others, used to drive Lead Plaintiff through biochemical torture and clinical depression to suicide ideation (paragraphs 462-469, 499-500, 511-512, 516-517, 520, 602 NSEC-3). This sequence of high stress events and manipulations induced severe brain biochemical imbalances, caused and created by defendant UNITED STATES and/or may directly involve other defendants and their respective agents. This created a very high risk of severe injury or death. The evidence as to the specific date range and sequence of the remotely commanded BRMT instructions which drive this sequence are available during discovery against these defendants.

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

Paragraph 694D LETHL-1 is incorporated herein by reference. Discovery will provide critical

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

Interline Exhibits:	Not applicable
Complaint paragraphs:	462-469, 499-500, 511-512, 516-517, 520, 602 NSEC-3;
	694-710 LETHL-1-17 generally
Appendix 2 paragraphs:	1-032
LPEE Table 2 pages 12023-12120	2-0115, 2-0117
paragraphs:	
LPEE pages (see technical note	140 et al, 419-426, 598-606, 774-785, 9679-9696
on page numbering at paragraph	
230):	
Emails and documents by topic	Not applicable
and date, also located in LPEE:	

## 697. LETHL-4 Lethality Attempts: Inciting Public Vigilantism, 2004-2024

A. Defendants with police powers hacked and manipulated Lead Plaintiff's personal computer to make his actions, plans, and movements a matter of public viewing sometime after he joined CNA Industrial Engineering in 1996. This led to and inspired violent acts against third parties, ranging from commercial enterprises to individuals (paragraph 602 NSEC-3). Defendants used the illegal BRMT bioweapon and bioweapon delivery system, tradecraft signaling, and direct action against third parties to create and sustain a public mythology about Lead Plaintiff, which directly endangered his life, well-being, personal prospects, employment, and entrepreneurial activities to further their illegal scheme as they employed public vigilantism, along with their direct acts against Lead Plaintiff, and harmed third parties to create and sustain the propagandistic mythology about the Lead Plaintiff while engaged in this corrupt process.

B. These direct acts ranged from mass casualty attempts to individual acts against innocent third parties with lethal and potentially lethal outcomes (paragraphs 706-710 LETHL-13-17). This fraudulent scheme, running into recent years, primarily has and does (i) use the illegal BRMT bioweapon and bioweapon delivery system to control certain of Lead Plaintiff's movements, public and private activities, words, expressions, and brain biochemistry (paragraphs 616 HEXP-13); induces on-going brain biochemical depression and induces suicidal ideations at times (paragraphs 604-607 HEXP-1-4); (ii) use wire frauds and email frauds to control Lead Plaintiff's digital and online environment (paragraphs 629, 630, 631, 635, 636 RGTS-9-11, 15, 16) (iii) to make his actions and reactions to the defendants' on-gong harassments public; (paragraphs 617-619 HEXP-14-16; 629, 630, 632 RGTS- 9, 10, 12) and (iv) systematically disrupts Lead Plaintiff's private and commercial actions including, without limitation, in its affects on interstate commerce (paragraphs 600-710, all subcounts in all series generally).

C. Defendants' overriding purposes has been and is, without limitation, to sustain and perpetuate the defendant UNITED STATES' ability to sustain its illegal and unconstitutional control Lead Plaintiff, and his moment-to-moment environment, actions, reactions across many years, perpetuate Lead Plaintiff's involuntary servitude, forced labor, all in violation of the *First*, *Third*, *Fourth*, *Fifth*, *Eighth*, *Ninth*, *Thirteenth*, and *Fourteenth* Amendments, and other civil, Constitutional, and human rights; to subject him to public sensationalism, greatly enhance the risk of direct violence and vigilantism against Lead Plaintiff; and create the circumstances for public harassment of Lead Plaintiff creating risks and circumstances which they could not legally conduct directly, and which could not otherwise occur in or to the Lead Plaintiff. These acts have been and are intended to discredit, damage, or harm the health and well-being of the

Lead Plaintiff through all feasible means, be it entrapment, intimidation, an act of lethal public vigilantism, or a natural appearing lethal sequence or event.

D. Defendant UNITED STATES most probably employed this method of extreme illegal BRMT bioweapon and bioweapon delivery system biochemical, physical, and sexual abuses to orchestrate the murder of Audrey Brewer in September 2011 (paragraph 10) using an physically and emotionally abused female intermediary as the direct perpetrator while acting in apparent extreme rage under the direct influence of the illegal BRMT bioweapon system used to biochemically hijack her pineal gland to surge adrenaline and thereby provoke the knife slashing attack which resulted in Audrey Brewer's death from the slashing of her carotid artery in her neck. The female perpetrator had absolutely no history of violence at any time but was also being psychologically provoked by the manipulative male who was involved in relationships with both females at various times. The psychological abuse of the apparent perpetrator is used in the moment as the concealment which hides the actual BRMT perpetrator of the extreme biomedical hijacking from view and exposure, since BRMT is highly classified, not previously known in human history, and leaves no trace evidence as it is a series of carefully focused energy pulses absorbed into the brain which leaves no trace evidence behind. This momentary sense of extreme rage which was most probably experienced by the knife wielder is comparable to the momentary biochemical rage induced in Lead Plaintiff by the illegal BRMT bioweapon in during an unrecorded incident adjacent to Lead Plaintiff's residence between August 2008 and October 2010 in Cliffside Park, NJ and the Tunnel Flash Incident documented at paragraph 619 HEXP-16, LPEE pages 11668. The intent of defendant UNITED STATES in orchestrating this process against US persons would have been and would be to facilitate its future deployment against others which it targets for assassination.

E. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 694D LETHL-1 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	10, 602 NSEC-3; 619 HEXP-16; 694-710 LETHL-1-17
	generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-	Not applicable
12120 paragraphs:	
LPEE pages (see technical note	1 et al, 140 et al, 419-426, 774-785, 9679-9696, 11668,
on page numbering at	LPEEV65-1
paragraph 230):	
Emails and documents by topic	Not applicable
and date, also located in LPEE:	

### 698. LETHL-5 Lethality Attempts: New Jersey BRMT Induced Suicide Ideation, 2008-2010

A. While a resident of the state of New Jersey, Lead Plaintiff was subject between approximately August 2008 and June 2010 to extreme BRMT hijacking of brain biochemistry and psychological abuse which defendants used to drive Lead Plaintiff to a suicide ideation (paragraph 631B RGTS-11). This sequence of high stress events and hijacking to create an extreme brain biochemical imbalance was caused and created by defendant UNITED STATES and/or may have directly involved other defendants and their respective agents (paragraphs 462-466, 471-473, 502-503, 512, 516-521, 527B; 600, 602, 603 NSEC-1, 3, 4; 606, 611, 614, 615, 617, 620 HEXP-3, 8, 11,12, 14, 17; 629-634 RGTS-9-14; 641, 642 RICO-3, 4). This created a very high risk of severe injury or death. The evidence as to the specific date range and sequence of these remote BRMT instructions given to sustain the event are available upon discovery against defendant UNITED STATES and other police powers defendants including, without limitation, defendants NJTPD, PAPD, NYPD, NJSP, BERGEN SHERIFF, BERGEN, as well as corporate, press, and individual defendants herein.

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

privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 694D LETHL-1 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	462-466, 471-473, 502-503, 512, 516-521, 527B; 600, 602,
	603 NSEC-1, 3, 4; 606, 611, 614, 615, 617, 620 HEXP-3,
	8, 11,12, 14, 17; 629-634 RGTS-9-14; 641, 642 RICO-3, 4;
	694-710 LETHL-1-17 generally
Appendix 2 paragraphs:	1-032
LPEE Table 2 pages 12023-	2-0150
12120 paragraphs:	
LPEE pages (see technical note	140 et al, 419-426, 598-606, 774-785, 9679-9696
on page numbering at paragraph	
230):	
Emails and documents by topic	Not applicable
and date, also located in LPEE:	

## 699. LETHL-6 Lethality Attempts: New Jersey Cliffside Park BRMT Falls, 2008-2010

A. While a resident of the state of New Jersey, Lead Plaintiff was subject between approximately 2008 and 2010 to a series of unexplained falls which were caused and created by defendant UNITED STATES, CIA, ARMY in its illegal and potentially lethal deployment of the illegal BRMT bioweapon and bioweapon delivery system. These falls caused the Lead Plaintiff to tip backwards while remaining in a completely erect posture, tipping him as if a statue, and created a risk of severe injury or death. One of these falls was triggered while the Lead Plaintiff was walking alone at the northwest corner of Thompson Lane and River Road. The back of the Lead Plaintiff's head struck the sidewalk, missing the base of a streetlight and a broken neck by

approximately 24 inches. The evidence as to the specific dates, times, and remote BRMT instructions which were given to initiate each event are likely to be available upon further investigation and discovery against defendants. Related comparable illegal BRMT induced hazardous events are shown at paragraph 615 617-619 HEXP-12, 14-16; 695, 700, 701, 703, 705, 706, 708 LETHL-2, 7, 8, 10, 12, 13, 15.

B. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 694D LETHL-1 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597.

Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	615 617-619 HEXP-12, 14-16; 695, 700, 701, 703, 705,
	706, 708 LETHL-2, 7, 8, 10, 12, 13, 15; 694-710 LETHL-
	1-17 generally

Appendix 2 paragraphs:	1-001C
LPEE Table 2 pages 12023-	2-0076, 2-0158
12120 paragraphs:	
LPEE pages (see technical note	140 et al, 419-426, 774-785
on page numbering at paragraph	
230):	
Emails and documents by topic	Not applicable
and date, also located in LPEE:	

700. LETHL-7 Lethality Attempts: BRMT Staircase Falls and Attempts in New Jersey and New York 2008-2022

A. While a resident of the state of New Jersey, Lead Plaintiff was subject from approximately 2008 to the present to a series of near falls in New Jersey and New York on staircases inside, for example, the Metropolitan Museum of Art ground floor entrance near the southeastern corner of the main building; at various times on stairs n his Edgewater, NJ residential building; in the building housing the third floor New School theater space, Museum of the City of New York, Port Authority Bus Terminal South Building, and numerous other locations. Defendant UNITED STATES, CIA, ARMY deliberately has and does use the illegal BRMT bioweapon and bioweapon delivery system to mislocate the placement of the foot on the stair, either by hitting the heel, or by misplacing the foot on the stair tread behind the toes, causing a fall. These loss of balance disturbances have been and are easily created with the illegal BRMT bioweapon and bioweapon delivery system. At other times, the illegal BRMT bioweapon and bioweapon delivery system is used to keep the head upright and eyes looking forward, instead of down toward the stair tread as needed for safe descent; by momentary interruption of central nervous system muscle control which drops the descending foot too early causing a trip; and/or by momentary loss of consciousness which causes a complete loss of positional awareness. Each and every such loss of balance event creates a risk of severe injury or death. The evidence as to the specific date, time, and remote BRMT instructions given to initiate

each event are available upon discovery against defendant UNITED STATES, CIA, ARMY and the co-conspirators participating in the set-up and conduct of each specific event. Related comparable illegal BRMT induced hazardous events are shown at paragraph 615 617-619 HEXP-12, 14-16; 695, 699, 701, 703, 705, 706, 708 LETHL-2, 6, 8, 10, 12, 13, 15.

B. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 694D LETHL-1 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	615 617-619 HEXP-12, 14-16; 695, 699, 701, 703, 705,
	706, 708 LETHL-2, 6, 8, 10, 12, 13, 15; 694-710 LETHL-
	1-17 generally
Appendix 2 paragraphs:	1-001D

LPEE Table 2 pages 12023-12120	2-0076, 2-0158, 2-0194
paragraphs:	
LPEE pages (see technical note	1 et al, 11-139, 140 et al, 419-426, 564-574, and 786-793
on page numbering at paragraph	
230):	
Emails and documents by topic	Not applicable
and date, also located in LPEE:	

#### 701. LETHL-8 Lethality Attempts: New Jersey Hackensack BRMT Fall, 2017

A. While a resident of the state of New Jersey, Lead Plaintiff was subject in approximately 2017 to an illegal BRMT bioweapon and bioweapon delivery system induced fall in a County of Bergen, NJ (BERGEN COUNTY) office building while leaving a housing interview appointment. This fall was caused and created by defendant UNITED STATES purposefully locking the Lead Plaintiff's eyes to the horizon rather than focusing on the stair he was descending at that moment, causing Lead Plaintiff to trip and fall forward. Lead Plaintiff's heel struck the edge of the stair tread, and he stumbled to one knee, abrading and injuring that knee. This event created a risk of severe injury or death. The evidence as to the specific date, time, and remote BRMT instructions given to trigger the event are available upon discovery against defendants. Related comparable illegal BRMT induced hazardous events are shown at paragraph 615 617-619 HEXP-12, 14-16; 695, 699, 700, 703, 705, 706, 708 LETHL-2, 6, 7, 10, 12, 13, 15.

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

racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 694D LETHL-1 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	615 617-619 HEXP-12, 14-16; 695, 699, 700, 703, 705,
	706, 708 LETHL-2, 6, 7, 10, 12, 13, 15; 694-710 LETHL-
	1-17 generally
Appendix 2 paragraphs:	1-001C
LPEE Table 2 pages 12023-	2-0076, 2-0158
12120 paragraphs:	
LPEE pages (see technical note	140 et al, 419-426, 774-785
on page numbering at paragraph	
230):	
Emails and documents by topic	Not applicable
and date, also located in LPEE:	

702. LETHL-9 Lethality Attempts: California BRMT Induced Extreme Eye Watering, 2017

A. While traveling for business between Pico Rivera, CA and Los Angeles International Airport on October 31, 2017, defendant UNITED STATES, CIA, ARMY, produced extreme eye irritation and watering of Lead Plaintiff eyes while he was driving west on the I-105 freeway near Lynnwood, CA, traveling approximately 65 to 70 miles per hour. This created a substantial risk of loss of vehicle control and collision with another vehicle or obstacle,

and the resultant severe risk of injury or death to himself and to members of the public. This was not an allergic reaction to any airborne substance. Lead Plaintiff previously spent years in this part of California under the same conditions and had driven this same freeway through this same area eastbound without incident about 3-4 hours earlier while traveling toward his meeting in Pico Rivera, CA.

B. Lead Plaintiff has subsequently experienced these symptoms periodically while using over-the-counter eye drops at home, likely due to a deliberate illegal BRMT bioweapon and bioweapon delivery system induced manipulation of the pH level of the eyes. These symptoms also correlate with extreme headaches and blurry vision induced on occasion during 2021 and 2022. Those extreme headache and blurry vision symptoms had also been experienced for months on end in Boston, MA in 2006-2007 and in Cliffside Park, NJ, in 2008-2010, where they occurred in both locations at the same morning hour each day. These symptoms abruptly appeared for a long sequence of daily headaches and vision issues, then abruptly disappeared with no medical reason for any of these repetitive abrupt changes in pattern. A neurological examination in Boston, MA, and two brain scans in New Jersey have provided no plausible medical explanation for these symptoms or for their long-duration irregular recurrences. Illegal triggering through BRMT bioweapon and bioweapon delivery system abuse is the sole remaining plausible explanation for this pattern, which correlates with the medically bizarre reversal of presbyopia with aging described at paragraphs 602F, 617G, H.

C. The evidence as to the specific date, time, and remote BRMT instructions given to initiate the event are available upon discovery against defendant UNITED STATES, CIA, ARMY. Similar illegal BRMT induced events include, without limitation, those related at

paragraphs 615 617-619 HEXP-12, 14-16; 695, 699-701, 705, 706, 708 LETHL-2, 6-8, 12, 13, 15.

D. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 694D LETHL-1 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597.

Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	615 617-619 HEXP-12, 14-16; 695, 699-701, 705, 706,
	708 LETHL-2, 6-8, 12, 13, 15; 694-710 LETHL-1-17
	generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-	Not applicable
12120 paragraphs:	
LPEE pages (see technical note	1 et al, 140 et al, 419-426, 774-785, 1074V (10/31/2017
on page numbering at paragraph	entry), 10306-10310
230):	

Emails and documents by topic and date, also located in LPEE:

Not applicable

## 703. LETHL-10 Lethality Attempts: New Jersey Edgewater Bedroom BRMT Falls, 2019

A. On two instances in 2019, Lead Plaintiff was rolled out of bed like a log and struck the floor. These falls were initiated while the Lead Plaintiff was sleeping alone in his residence in Edgewater, NJ. These falls were caused and created by defendant UNITED STATES or its agents using the illegal BRMT bioweapon and bioweapon delivery system. One of these falls caused a visible head injury to the right side of his forehead as the head struck a nightstand as the rest of the body continued falling to the floor, which torqued the neck and spinal cord. This injury left an obvious scar on his forehead which was noted several months later, and again over a year later, by medical professionals during routine head examinations at dental hygiene appointments at the Bergen Community College Dental Hygiene Clinic. Medical records which recorded these notations have been requested under HIPPAA. These falls created risks of severe injury or even death as a result of the head strike while the body continued to fall to the floor, potentially fatally torquing the neck and spinal cord. The evidence as to the specific dates, times, and remote BRMT instructions given to initiate these falls are available upon discovery against defendants. Similar illegal BRMT induced events include, without limitation, those related at paragraphs 615 617-619 HEXP-12, 14-16; 695, 699-701, 705, 706, 708 LETHL-2, 6-8, 12, 13, 15.

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

development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 694D LETHL-1 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	615 617-619 HEXP-12, 14-16; 695, 699-701, 703, 705,
	706, 708 LETHL-2, 6-8, 10, 12, 13, 15; 694-710 LETHL-
	1-17 generally
Appendix 2 paragraphs:	1-001C
LPEE Table 2 pages 12023-	2-0076
12120 paragraphs:	
LPEE pages (see technical note	140 et al, 419-426, 774-785
on page numbering at	
paragraph 230):	
Emails and documents by topic	Not applicable
and date, also located in LPEE:	

704. LETHL-11 Lethality Attempts: Website Hacks to Eliminate or Delay Covid Vaccination, 2020

A. On 149 occasions from late January to March 24, 2021, defendant UNITED STATES, CIA, ARMY hacked or spoofed Lead Plaintiff's access to www.bergencountycovidvaccine.com so an appointment could not be made to receive the

Covid-19 vaccine he was eligible for as a 65 year old, creating additional risks of hospitalization, severe injury, or death. On occasion, he navigated through the identification and qualifications phases to the appointment setting step before being denied an appointment during that step while he was attempting to set the specific time for the specific appointment, at other times he was informed at that screen that there were no appointments available. He emailed with the BERGEN COUNTY Executive's office about these issues over an extended conversation, and also emailed Bergen County Council members about the matter but received no response from any of the Council member (likely due to email blocking by defendants, who likely also spoofed both this only available Covid-19 vaccination site at that time and any relevant email responses intended to be received by Lead Plaintiff). See paragraph 631 RGTS-11.

B. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 694D LETHL-1 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant

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

Interline Exhibits:	Not applicable
Complaint paragraphs:	631 RGTS-11; 694-710 LETHL-1-17 generally
Appendix 2 paragraphs:	Not applicable
LPEE Table 2 pages 12023-	2-0188
12120 paragraphs:	
LPEE pages (see technical note	140 et al, 419-426, 794, 9875, 10187-10250
on page numbering at paragraph	
230):	
Emails and documents by topic	Currently blocked by defendant UNITED STATES
and date, also located in LPEE:	computer hack

## 705. LETHL-12 Lethality Attempts: New Jersey Edgewater BRMT Falls, 2021 to present

A. While a resident of the state of New Jersey, Lead Plaintiff was subject between approximately December 2021 and August 2022 to unexplained tripping and falling events. These events were caused and created by defendant UNITED STATES, CIA, ARMY using the illegal BRMT bioweapon and bioweapon delivery system to cause momentary blackouts, and/or contract or relax muscles of Lead Plaintiff, leading to a loss of control and balance. These events caused the Lead Plaintiff to trip and very nearly fall near the southwest corner of the Edgewater Commons south access road at River Road, and at another time, while crossing River Road near Penny Lane, both in Edgewater, NJ. Failure to quickly regain his balance by stumbling forward to an upright posture could have ended with the Lead Plaintiff falling onto this heavily traveled street. Such an outcome could have caused severe injury or death in traffic. Evidence as to the specific date, time, and remote BRMT instructions given to initiate each event are available upon discovery against defendants. Similar illegal BRMT induced events include, without

limitation, those related at paragraphs 615 617-619 HEXP-12, 14-16; 695, 699-701, 706, 708 LETHL-2, 6-8, 13, 15.

B. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 694D LETHL-1 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597.

Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	615 617-619 HEXP-12, 14-16; 695, 699-701, 703, 706,
	708 LETHL-2, 6-8, 10, 13, 15; 694-710 LETHL-1-17
	generally
Appendix 2 paragraphs:	1-001D
LPEE Table 2 pages 12023-	2-0196, 2-0202
12120 paragraphs:	
LPEE pages (see technical note	140 et al, 419-426, 774-785, 11665-11666
on page numbering at paragraph	
230):	

Emails and documents by topic and date, also located in LPEE:

## 706. LETHL-13 Lethality Attempts: North Bergen Hospital Fall, 2021

A. While a resident of the state of New Jersey, Lead Plaintiff was subject in April 2021 to an illegal BRMT bioweapon and bioweapon delivery system induced fall in Palisades Medical Center, North Bergen, NJ. This fall caused the Lead Plaintiff to tip to the right while remaining completely rigid, tipping him as if a statue. His head narrowly missed striking the vulnerable skull opening of the right temple on a 4 inch tall metal base of a rolling bed table at floor level. This fall was caused and created by defendant UNITED STATES, CIA, ARMY use of the illegal BRMT bioweapon and bioweapon delivery system to create a risk of severe injury or death. The evidence as to the specific date, time, and remote BRMT instructions which were given to initiate the event are available upon discovery against defendants. Medical evidence which documents this event and the follow-on medical tests required before a doctor would release the Lead Plaintiff from the hospital have been requested from SCIARRA, the attending physician, and Palisades Medical Center, North Bergen, NJ, as has the identity of the medical doctor who attended the Lead Plaintiff and ordered an MRI immediately after the fall, and who also noted an alleged irregular heartbeat and made a referral to ASTUDILLO for cardiology follow-up (see 710 LETHL-17). SCIARRA has stated in an email to Lead Plaintiff that there are no such records as his medical practice entity in New Jersey is defunct. This incident is subject to further discovery, noting that SCIARRA abruptly abandoned his decades-long northern New Jersey medical practice soon after this incident. Similar illegal BRMT induced events include, without limitation, those related at paragraphs 615 617-619 HEXP-12, 14-16; 695, 699-701, 705, 708 LETHL-2, 6-8, 12, 15.

B. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 694D LETHL-1 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	615 617-619 HEXP-12, 14-16; 695, 699-701, 703, 705,
	708 LETHL-2, 6-8, 10, 12, 15; 694-710 LETHL-1-17
	generally
Appendix 2 paragraphs:	1-001E, 1-039
LPEE Table 2 pages 12023-12120	2-0193, 2-0194
paragraphs:	
LPEE pages (see technical note	140 et al, 419-426, 774-785
on page numbering at paragraph	
230):	
Emails and documents by topic	Not applicable
and date, also located in LPEE:	

# 707. LETHL-14 Lethality Attempts: New York Metro North Mass Casualty Attempt, 2022

A. While a resident of the state of New Jersey, Lead Plaintiff boarded a Metro North Hudson Line express train from Beacon, New York to Grand Central Terminal in New York City on Sunday evening, September 11, 2022. The express train was traveling south at approximately 50 to 60 miles per hour when the engineer urgently braked the train to an emergency stop as the train collided with a tree which had fallen or been fallen to block at least three of the four railroad tracks at that point, including the southbound express track the train was traveling on at the time.

B. This incident occurred within 2 to 3 minutes after sundown, just after the sun had set to the south, directly impacting engineer's adjustment from bright daylight with sun setting on the horizon almost directly ahead to night vision. The location of the tree strike was carefully selected by those who planned the strike for this moment right after sunset as the train engineer's eyes would take several minutes to adjust to night vision from the bright sunlight of the setting sun directly in his eyes to the moonless darkness of that night. The location was a relatively remote track section with no nearby structures or inhabitants, so there were no ambient light sources in the area. If the tree had been larger, the train would have contacted a more substantial portion of the trunk of the tree, and with the tree's full weight and its root ball still wedged in the ground, it could have exerted enough lateral force to derail the train at its relatively high speed. This created a very significant risk of injury or death to the Lead Plaintiff and several hundred other passengers while the train operated about 20 feet from edge of the embankment on the Hudson River. Similar illegal mass casualty events include, without limitation, those related at paragraphs 602 NSEC-3.

C. There was a specific sequence of further follow-on events, reportedly including a stalled train, which then resulted in the Lead Plaintiff's exit from that MTA Hudson Line express train at Yankee Stadium, one stop short of his destination, where he walked to the MTA 4 line subway train to complete his travel to Grand Central Terminal in New York City. This sequence included noted signature tradecraft events, details available from defendants upon discovery, indicating the detail's knowledge and pre-planning of this sequence by defendants under command authority of defendants with police powers which would have occurred well in advance of his arrival at the Yankee Stadium station where he walked to the 4 line subway train, all of which is indicative of pre-planning far in advance of the Yankee Station transfer. Evidence of the specific defendants who conspired and/or caused this event sequence is available upon discovery.

D. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 694D LETHL-1 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among

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

Interline Exhibits:	15, Appendix paragraph 1-056
Complaint paragraphs:	602 NSEC-3; 694-710 LETHL-1-17 generally
Appendix 2 paragraphs:	1-056
LPEE Table 2 pages 12023-	2-0099, 2-0202
12120 paragraphs:	
LPEE pages (see technical note	413-415, 416-418, 542-547, 564-574, 598-606, 766-769,
on page numbering at paragraph	772-773, LPEEV65-11
230):	
Emails and documents by topic	Not applicable
and date, also located in LPEE:	

### 708. LETHL-15 Lethality Attempts: New York Morningside Park BRMT Fall, 2022

A. While a resident of the state of New Jersey, Lead Plaintiff was subject on September 17, 2022 at 7:29PM to a fall from the top step of a deliberately darkened staircase in a series of park pathway stairs spread over 250 feet in the southwest corner of Morningside Park, a New York City Park (defendant NYC) which was caused and created by defendant UNITED STATES, CIA, ARMY acting in coordination with individuals employed by defendants NYC and/or NYPD. This illegal BRMT bioweapon and bioweapon delivery system induced fall caused the Lead Plaintiff to misplace his left foot on the top stair, lose his balance, and do a complete forward somersault on the stairs, landing on his back on the set of stairs, injuring his head, knees, and hands (Interline Exhibit 15C). This fall created a specific risk of severe injury or death. Further evidence corroborating the specific date, time, and remote BRMT instructions given to initiate this event are available upon discovery against defendants. Similar illegal

BRMT induced events include, without limitation, those related at paragraphs 615, 617-619 HEXP-12, 14-16; 695, 699-701, 705, 706 LETHL-2, 6-8, 12, 13.

B. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 694D LETHL-1 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	15C
Complaint paragraphs:	615 617-619 HEXP-12, 14-16; 695, 699-701, 705, 706,
	LETHL-2, 6-8, 12, 13; 694-710 LETHL-1-17 generally
Appendix 2 paragraphs:	1-058, 1-059
LPEE Table 2 pages 12023-	2-0076, 2-0099, 2-0202, 2-0203
12120 paragraphs:	
LPEE pages (see technical note	140 et al, 419-426, 542-547, 564-574, 786-793, 10302-
on page numbering at paragraph	10304, LPEEV65-11
230):	

Emails and documents by topic and date, also located in LPEE:

Not applicable

### 709. LETHL-16 Lethality Attempts: New Jersey North Bergen Vehicle Rundown. 2022

A. A vehicle rundown sequence, intended to harm and/or intimidate the Lead Plaintiff was conducted in New York City and North Bergen, NY on November 18 and 19, 2022. Two streets being crossed by Lead Plaintiff in New York City had their streetlights extinguished in both directions from Eighth Avenue (Interline Exhibit 15D) and electric scooters ran in the opposite travel direction from normal traffic on these one-way streets after dark. No other vehicle traffic was on either street at this time. About 90-110 minutes later, normal vehicle traffic in the proper direction was allowed on these streets as the Lead Plaintiff returned to the same subway station from a performance event. The following night the illegal BRMT bioweapon and bioweapon delivery system was used as his attention was distracted toward a bright light and his left peripheral vision was limited by his rightward diagonal angle of travel across a parking lot travel aisle. While his walking pace was fixed by the illegal BRMT bioweapon and bioweapon delivery, a white compact car in the left distance traveling slowly south in the traffic aisle was rapidly accelerated and raced toward him in the parking lot of the North Bergen, NJ WALMART, whereupon it was panic slowed very abruptly within 15 feet of the Lead Plaintiff, and coming to a final stop about 5 feet away just after it had entered his peripheral vision. As he visited a restroom in the Wendy's restaurant after a meal there, a male appeared to vomit into the restroom sink. There was no injury from this event sequence, but this pattern of practice was and is completely consistent with other coordinated illegal BRMT bioweapon and bioweapon delivery system, and related physical violence and intimidation attempts directed at the Lead Plaintiff, as further described in these subcounts and narrative.

These close pass and near miss incidents, with high speed electric scooter, electric bike, pop-out cars, cross-town buses, and single axle commercial trucks (police powers cover vehicles) have been particularly pervasive in NYC.

B. This scheme and conspiracy required and consumed the time and financial resources of Lead Plaintiff, and his business entities, in bad faith perpetuation of defendants' long-running schemes, frauds, and swindles to sustain defendant UNITED STATES' involuntary servitude over Lead Plaintiff, and all the elements thereof including, without limitation, illegal BRMT development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 694D LETHL-1 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597.

Evidentiary materials related to this specific subcount follows:

Interline Exhibits:	15D
Complaint paragraphs:	694-710 LETHL-1-17 generally
Appendix 2 paragraphs:	1-064, 1-065, 1-066
LPEE Table 2 pages 12023-	2-0099, 2-0203 through 2-0215
12120 paragraphs:	
LPEE pages (see technical note	LPEEV65-11
on page numbering at paragraph	
230):	

Emails and documents by topic and date, also located in LPEE:

Not applicable

## 710. LETHL-17 Lethality Attempts: Programmed Health Collapse, 2023

A. During 2023 into early 2024, Lead Plaintiff observed defendants' direct attempts to construct a programmed health collapse narrative using health professionals assigned to Lead Plaintiff through the health care plan, Braven, which was used by defendants as part of their ongoing illegal involuntary servitude and other acts, violations, and injuries to Lead Plaintiff. Two primary sequences have been used to construct this narrative:

- (i) on-going obstructions of the colon which have presented in a medically very unlikely sequence, paragraph 710 LETHL-17
- (ii) a cardio/heart health sequence which appeared without any prior history at the time of the fall related in paragraph 706 LETHL-13.
- B. Lead Plaintiff began experiencing constipation in irregular cycles around 1984. Periodically throughout and after these progressions, Lead Plaintiff's constipation completely disappeared, then recurred in bouts. This illegal BRMT bioweapon and bioweapon delivery system abuse form of pattern, their abrupt appearances, disappearances, and recurrence of patterns, matches other such anomalous health patterns of reversing presbyopia and extreme headaches cycles, as noted at paragraph 702B. While others also naturally experience this issue, it is notable as illegal BRMT bioweapon and bioweapon delivery system hijackings of brain biochemistry, per paragraph A(i) above, and is potentially lethal, given the bizarre and aggressive form this illegal BRMT hijacking has taken on in 2023-24.
- C. This specific 2023-24 colon blocking sequence is evidenced by a series of Lead Plaintiff diary entries which identify a specific sequence of highly medically improbable

occurrences including the progressive cyclic failures of a series of normal medical interventions including fiber supplements, polypropylene glycol, and lactulose. Further, the lag period between each of those medical interventions and the normal period in which they act upon the body, compared to the direct experience of the Lead Plaintiff, does not consistently match their normal efficacy and lag time patterns. This can only plausibly be explained as an external intervention using the illegal BRMT bioweapon and bioweapon delivery system, a biomedical abuse tool available only to defendant UNITED STATES, CIA, ARMY. When explained to Lead Plaintiff's primary physician PATEL, actually an employee of defendant UNITED STATES, the physician recommended contacting a gastroenterologist, suggested one might be joining his local practice at some point in the near future, then simply walked away, suggesting a return visit in three months. Upon attempting to contact the gastroenterologist SCIARRA, whose office had completed the colon examination described at paragraph 706 LETHL-13, the phone company message indicated the office phone line had been temporarily disconnected and the gastroenterologist's direct personal cell phone was not accepting calls. As a result of this followup, Lead Plaintiff discovered that SCIARRA, who had a longtime northern New Jersey gastroenterological medical practice, had abruptly relocated to Beaufort, North Carolina in the months after Lead Plaintiff's hospital fall at paragraph 706 LETHL-13. See LPEE pages 11656-11664, 12234-12244, LPEEV65-2, 13-16.

D. The heart health narrative sequence is evidenced by ASTUDILLO, a cardiologist who was introduced to Lead Plaintiff immediately after the North Bergen hospital fall at Palisades Medical Center in 2021, paragraph 706 LETHL-13, reviewed a routine EKG in 2022 and said there was no imminent danger and that routine follow-up was adequate, then reviewed another routine EKG in 2023 which looked identical to the 2022 EKG to Lead Plaintiff, and

surprisingly recommended an extensive series of tests, including a wearable round the clock heart monitor and a hospital based heart test. See LPEE pages 12160-12233.

E. During a prior visit to this cardiologist's office, a pulse monitor had indicated the Lead Plaintiff heart rate was 38 beats per minute, at a time when the actual reading was well within normal range of about 65 to 74 beats per minute based upon the Lead Plaintiff's own physical body reactions at that time. Depending upon the actual software code in the EEPROM (electrically erasable programmable read only memory) of the wearable heart monitoring device, the monitoring device itself could be manipulated to suit a specific cardio health narrative intended by defendant UNITED STATES, CIA, ARMY simply by hacking the software to record a different pattern to the device's memory than is actually being experienced by the wearer of the monitor. This allows the third party intervenor (perhaps a nefarious defendant UNITED STATES, CIA, ARMY) to construct an alternative health narrative about the patient, so that the patient can be orchestrated into an apparently natural adverse life outcome using the illegal BRMT bioweapon and bioweapon delivery system to manufacture a specific intervention, such as a fatal heart attack. The illegal BRMT bioweapon and bioweapon delivery system can and does control any bodily function selected by the perpetrator operator for modification or termination, as demonstrated by, among other things, the unnatural nature of the colon interventions described in subparagraph B above. Medical records and related medical tests will be produced from the attending physicians through the discovery process.

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

development and deployment; illegal human subject medical experimentation without consent, to and including torture and suicide ideations; systematic constitutional rights violations; and racketeering acts in an associated-in-fact enterprise. All paragraphs above are incorporated herein by reference including, without limitation, paragraph 599, with particular attention directed to paragraph 599D pattern abuses by defendant UNITED STATES of the state secrets privilege in violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U.S. 1 (1953). Paragraph 694D LETHL-1 is incorporated herein by reference. Discovery will provide critical confirming information directly from these institutional and individual defendants and, among some who presented at the time as family members, their children. See other selected relevant content at paragraph 600Q and in searchable indexes and lists at LPEE Compendium at pages 934-1075, as well as other LPEE volumes added subsequently as noted at paragraph 597. Evidentiary materials related to this specific subcount follow:

Interline Exhibits:	Not applicable
Complaint paragraphs:	706 LETHL-13; 694-710 LETHL-1-17 generally
Appendix 2 paragraphs:	1-067
LPEE Table 2 pages 12023-12120	2-0217
paragraphs:	
LPEE pages (see technical note	11656-11664, 12160-12233, 12234-12244, LPEEV65-2,
on page numbering at paragraph	11, 13-16
230):	
Emails and documents by topic	Not applicable
and date, also located in LPEE:	

711. Paragraph 711 is reserved.

# **Key Illegal BRMT Program State And Local Government Co-Conspirators' Relationships To Federal Defendants**

712. Defendant UNITED STATES, DOJ, FBI, USMS, DOD, CIA, ARMY, NIAID current and former senior executives both directly perpetrated and supervised illegal BRMT bioweapon and bioweapon delivery system field development test and deployment,

constitutional, civil and human rights violations, and racketeering acts, violations, and injuries, in conspiracy with state and local governments in various states where Lead Plaintiff and other plaintiffs have and do reside, work, worship and conduct other activities of normal life. There is a clear long-running pattern of an associated-in-fact racketeering enterprise in which these individual defendants have and do engage in this misconduct and pattern of racketeering acts and rights violations systematically not prosecuted by defendant DOJ since at least 1961 (paragraphs 1-37, 550-584).

713. From the 1960s into at least 1979, while Lead Plaintiff attended schools and colleges funded by defendant WASH, the illegal BRMT program manager BREYER, then operating from an assistant professor position at Harvard University, posed in Washington state as Snow, fraudulent church elder and apartment developer in Kent, WA at least between 1970-72, then as Jack Sackville-West, parent of Perham Hall Lead Plaintiff co-resident Bill Sackville-West, and as a Spokane architect, from at least 1974 until his supposed demise and memorial service in the 1990s shortly before his ascent to the US Supreme Court. This fraudulent memorial service at Spokane Presbyterian Church to bury the Jack Sackville-West legend in Spokane, WA, which fraudulent memorial service was attended by the unwitting Lead Plaintiff, who sat as part of the Sackville-West family, and by Admiral Stansfield Turner, former CIA Director under President Carter who had walked by the Lead Plaintiff as he visited the National Gallery of Art East Building rotunda in a cameo in Spring 1979, paragraph 424. On his return flight to Seattle, the unwitting Lead Plaintiff sat next to Admiral Turner using a first class upgrade offered and purchased by the former CIA Director.

714. While employed by defendants ARMY and CIA on the illegal BRMT bioweapon and bioweapon delivery program, defendant BREYER was in defendant ARMY Reserves from

1957-65, including six months active duty in Intelligence. BREYER then operated under cover as a Harvard Law School Assistant Professor from 1967-1980. This time period specifically coincides with the entirety of Lead Plaintiff's human trafficking during his education between 1967 and 1979, which incorporates, without limitation, (i) the initial known illegal human trafficking in 1968 to the California campground by Gary Jack for the illegal BRMT oxytocin hijacking of Lead Plaintiff's pineal gland, (ii) the 1970 Reye Syndrome aspirin/codeine murder of sister Sandra by embedded doctor KOHLER (paragraphs 99d, 417, 418, 714, 740, 803C-D, 805B(i), H, S, BS, 806B, 814B) whose improper prescription of aspirin and codeine was the cause of her death, (iii) the immediate subsequent 1970 fraudulent home church transfers to the homes of Elder Snow (BREYER) and to the Northeast Tacoma home churches of Lead Plaintiff's family of origin, (iv) the equilibrium disruptions and fall from a family Shetland pony to a head temple blow strike injury of Sandra's surviving twin Susan and, (v) in that same time period, KATYAL's comparable fall from a family horse breaking ribs during a riding lesson being given to KATYAL and to Grady by Lead Plaintiff, (vi) through multiple fraudulent and BRMT manipulated friendships and relationships in high school, and (vii) through other national security entanglements including, without limitation, at Green River Community College and defendant WSU. All these operations were directly supported and contributed to by various state and local governments and their employees, officers, and agents in Washington state, defendants FWSD, WASH, WSU, KCSD, as described below at paragraphs 716-781.

715. Defendant BREYER (ARMY Intelligence, CIA) also conspired with defendant WEISSMAN (FBI) during this period. Defendant WEISSMAN, while embedded at Associated Grocers, a Seattle, WA based grocery wholesaler to independent supermarkets, supervised the team which was fraudulently deployed into Larry's Markets (paragraph 418), Federal Way, WA,

which was co-owned by Larry Brewer, a cousin of Lead Plaintiff's father, during that surreptitious undercover FBI grocery store co-ownership and enterprise wrecking process which continued as Lead Plaintiff was employed there from 1972-1974. Defendant BREYER also conspired with FBI's Earl Keller, who was illegally embedded at Smith Brothers Dairy as Lead Plaintiff's father Don's minder from 1963, in the sequence of minders from at least 1961 and Pacific Paper Products, Tacoma, WA while he had worked in California from 1961-63, as the illegal BRMT bioweapon and bioweapon delivery system secret program managed the religious discrimination and other constitutional rights violations by defendant UNITED STATES, DOJ, FBI, CIA, ARMY against Lead Plaintiff's extended family enslaved in involuntary servitude to defendant UNITED STATES. Defendant BREYER also conspired with other unknown defendants against the Lead Plaintiff's uncle in Walla Walla, WA during this time period, upon his uncle's return from Fort Hood, Texas after service in defendant ARMY, all in furtherance of the illegal BRMT bioweapon and bioweapon delivery system program.

#### A. Defendant Federal Way School District

716. In 1969 or 1970, defendant Federal Way School District (FWSD) conspired with defendant UNITED STATES to organize a new high school, which according to defendant KATYAL (DOJ, fellow student Shawn Morrissey) was named Decatur based upon defendant KATYAL's lobbying of the FWSD Board Chair, with whom he represented he lived at the time. Decatur was formed prematurely as the school district grew, specifically to accommodate the illegal BRMT bioweapon program's further development cycle under defendant BREYER by its illegal human subject medical experiments on extended family members, including Lead Plaintiff, from about 1968 forward (paragraphs 2-7, 357-402, 604-619 HEXP-1-16), and on others in the small 80-90 student initial high school class. Defendant KATYAL attended with Thomas Grady, his DOJ/FBI working partner. In 1970-71, Decatur High School had a few

teachers and was housed in a small former district administration building adjacent to the existing Federal Way High School where all but a few classes were taught by Federal Way High School faculty. In Fall 1971, Decatur was moved to a new junior high school campus for the subsequent two years, at what later became Illahee Junior High School. A normal size high school class of around 200-300 was admitted at the Illahee site. The Decatur High School campus was completed and opened in Fall 1973, after the Lead Plaintiff's graduation in June 1973, held at Illahee.

717. The new sophomore class which entered in 1971 at the Illahee campus included Stuart Bettesworth (plausibly identified as GARLAND, paragraphs 5, 99m, 417-418, 845E(vii)), Frank Backman, also a junior, and his sister Mariam Backman, a sophomore, who allegedly had a romantic relationship with Bettesworth (GARLAND). Mariam Backman, presumably a false identity, may previously have been Karen Milholland in 1966-67 while posing as a sixth grade classmate at Lakeland Elementary School alongside classmate Martha (who was later Janet RENO, Attorney General from 1993-2001, as photo identified by Lead Plaintiff in April 2024). Miriam Backman (also plausibly Karen Milholland) also plausibly later reappeared as Karen Sackville-West (daughter of defendant BREYER as Jack Sackville-West) in Spokane in 1974-76, and as a Tacoma, WA area teacher working on her Masters Degree in Education in Summer 1978, (paragraphs 211, 417B, 467, 717, 762 table, 805AB, AC, AK) as introduced at WSU by Allene Sampson, while Lead Plaintiff attended graduate school for his MBA at defendant WSU. Sampson has been plausibly identified in April 2024 as Lisa Desjardins, now an employee of PBS News, the public media organization. Other members of defendant DOJ, FBI, ARMY, CIA, and other unknown federal agencies, who posed as students to perpetuate the illegal BRMT program and the involuntary servitude of the Lead Plaintiff and others, also attended through this special accommodation granted to defendant UNITED STATES by defendant FWSD, as orchestrated by defendants KATYAL and BREYER, and unknown others. Decatur High School was overseen by school principal Dietrich, and by a vice principal name not recollected who directly fits the forensically identified defendant DOJ/FBI model agent profile of the time, and was taught by still other unknown defendant UNITED STATES and FWSD personnel who operated as educators during the years Lead Plaintiff attended until his June 1973 graduation.

#### B. WSU – Defendant Washington State University

718. Upon leaving Decatur and defendant FWSD, Lead Plaintiff attended Green River Community College (GRCC), which included defendant KCSD personnel and defendant UNITED STATES personnel, embedded as both students (Donna Dickover, David Brunton, others) and as faculty. Terry Buckles, employed by defendant WASH, who presented as a Washington Library Network employee in 1973-74 (and later as Wolfgang Opitz, on WA Governor Locke's staff when next met by the unwitting Lead Plaintiff in 1999, see paragraph 729 below), befriended and socialized with Lead Plaintiff. Lead Plaintiff continued to work at Larry's Market, where other defendant UNITED STATES personnel were embedded and which was secretly co-owned by defendant FBI (paragraph 418), all as part the comprehensive surrounding and surreptitious involuntary servitude and control of the Lead Plaintiff and his extended family by defendants' government, intelligence, and police powers personnel in the illegal BRMT bioweapon and bioweapon delivery system program managed by defendant BREYER.

719. Defendant WSU supported federal police powers operations and an initial surreptitious undergraduate introduction of the unwitting Lead Plaintiff to the Whitman County Sheriff office using a faked volunteer search and rescue squad, orchestrated classroom assignments of embedded federal agents as fellow undergraduate students and permitted

embedded defendant UNITED STATES personnel as teaching assistants to provide false feedback on inorganic chemistry lab results. Undergraduate years at Washington State University, Pullman, WA, included nearly continuous contacts with federal officers, agents, informants, university and state employees, who posed as roommates, friends, fellow employees, romantic interests, insurance agents, recreational program staff, and in other roles intended to provide defendant UNITED STATES' BRMT program management with continuous awareness and extremely powerful adverse influence over nearly all life choices. While a WSU undergraduate student, the Lead Plaintiff was still being handled in the field under a team headed by BRMT program executive Jack Sackville-West (BREYER), acting on behalf of defendants ARMY and CIA, who was later known as Stephen BREYER a federal appellate judge and Supreme Court Associate Justice.

720. Upon transferring from Green River Community College to Washington State
University in Fall 1974, Lead Plaintiff was assigned to Perham Hall, a WSU student dormitory.

Lead Plaintiff was unwittingly and unknowingly handled throughout college and graduate school by federal agents posing as fellow students and roommates beginning at Green River Community College, Auburn, Washington by Dickover and Brunton who transferred with Lead Plaintiff to Washington State University, Pullman, Washington in Fall 1974. During his first semester, his first assigned roommate Jay Costa was replaced by Andrew Ng, a British national from Hong Kong. Soon thereafter, the Resident Assistant who supervised the Perham residence hall floor for WSU was replaced by Michael CUNHA, introduced as an AFROTC member working toward medical school admission in psychiatry in the Air Force. In Perham Hall, he met and developed friendships and/or close personal relationships with defendants Craig PAGE, William (Bill)

SACKVILLE-WEST, Bill's "father" Jack (defendant BREYER) and other Jack and Dorothy

SACKVILLE-WEST family members in Spokane, WA, Robert Mandich (GARLAND), CUNHA; as well as Linda Pogreba, Karen Raines, Susan Irish, Lynn Sorenson, Vic Jones, James Carberry, Tracy Berry, Katherine "Kit" Andrews, Bob Ross, among many others, as an undergraduate. This team included BREYER's undercover "Jack and Dorothy family of wife and seven children," with three remaining children – Bob, Bill, and Jim (the latter known today as Jack Smith – DOJ Special Counsel) who principally resided in the Spokane, WA area "family home" at 1424 South Maple Street, where Lead Plaintiff was a frequent weekend guest, having been befriended by William (Bill) Sackville-West who resided in WSU student dormitory Perham Hall on the same floor as Lead Plaintiff in 1974-75 and in Nez Perce Village thereafter, a few buildings east of Lead Plainitff's apartment, which he shared with NG and PAGE in 1975-76 and with PAGE in 1976-77.

721. Current Attorney General GARLAND has been forensically identified by Lead Plaintiff in late 2023 as the person known to him as Robert Mandich while GARLAND operated undercover at Washington State University (WSU), Pullman, WA in 1974-1976, posing as a student co-resident on the same residential floor of the WSU Perham Hall student dormitory in 1974-75 and as a student neighbor in WSU Nez Perce Village student apartment housing in 1975-76 while driving a well-used green Mercury Capri, in support of this illegal program under the supervision of BREYER, its apparent field executive then housed first in Kent, WA, then in Spokane, WA (paragraphs 99d, 111, 211, 417-419).

722. While a Washington State University, Pullman, Washington (WSU) undergraduate, Lead Plaintiff had a nearly two year relationship with Susan B. Irish, which included an overnight canoe trip to Dworshak Reservoir east of Lewiston, Idaho accompanied by a WSU Recreation Department group which had two males camping in an adjacent tent. This event

sequence bore a strong resemblance to the camping trip he had taken at the age of 12 with Gary Jack where he was oxytocin (love hormone) hijacked in a California State Park for illegal biomedical experiment without consent with no direct sexual abuse, by the use of a local BRMT hormone manipulation device triggered by two males in an adjacent tent camping spot. Lead Plaintiff also noted, during forensic review in 2021, the likelihood of certain oxytocin enhancements of Katherine "Kit" Andrews and the simultaneous flattening of Lead Plaintiff oxytocin levels while an undergraduate, which likely were illegally BRMT bioweapon and bioweapon delivery system hijacked. This was noted in particular, as the potential for such a relationship was specifically verbally minimized by then close friend and co-resident of Perham Hall, William SACKVILLE-WEST, the ostensible son of Jack Sackville-West (BREYER), after Lead Plaintiff was called out during a Cougars basketball game by Katherine's roommate, a WSU cheerleader, to join the skylined Katherine in the vacant school band section diagonally across the Performing Arts Coliseum from Section 51 where Lead Plaintiff was sitting at the time with Bill SACKVILLE-WEST and Craig PAGE. Lead Plaintiff graduated in June 1977 with a BA degree in Business Administration.

723. In February 1978, Lead Plaintiff returned to defendant WSU as an MBA program graduate student. Defendant WSU provided the Lead Plaintiff with the MBA student employment which allowed him to attend, an office assignment with a defendant CIA Iranian asset officemate and assigned professor/student employment and academic advisor of the Lead Plaintiff to the embedded federal agent professor SHAFFER. SHAFFER was Lead Plaintiff's primary graduate school contact in the WSU faculty. SHAFFER, to whom Lead Plaintiff acted as a Teaching Assistant, was allegedly formerly employed by a petroleum company (a CIA tradecraft rhyme which alluded to the Iranian CIA asset with whom Lead Plaintiff then officed).

SHAFFER was joined by Don Yale, likely the ARMY embed posing as a retired Navy Supply officer and Assistant Professor.

724. Other national security entanglements also occurred in this time period including, without limitation, being assigned to co-office with Hamid Bahari-Kashani, an Iranian national economics PhD candidate and supporter of the Shah of Iran, whose family doubtless had CIA or other US connections. Bahari-Kashani, an Iranian national whose family was connected to and loyal to the Shah of Iran (installed as penultimate head of state with help from CIA). The Shah abdicated and left Iran in January 1979 as described at paragraphs 421-424 above. Lead Plaintiff was then reassigned away from his shared office with Bahari-Kashani to a shared office in the basement of Todd Hall (now Carson Hall) with defendant CIA and FBI personnel then attending the WSU MBA program.

725. During WSU Spring Break sometime in March or April 1979, CIA Director Stansfield Turner walked past the completely ignorant Lead Plaintiff with an intent knowing stare in the rotunda of the East Building of the National Gallery of Art (during his return to WSU from a job interview trip to GTE in Stamford, CT he spent much of the Spring Break week in Washington, DC), as Stansfield Turner examined Lead Plaintiff (Appendix 2 paragraph 1-008, 1-009), one of defendant CIA and ARMY's unwitting illegally subjugated human medical experiment victims used for illegal BRMT bioweapon and bioweapon delivery system development. Years later, Turner would upgrade him to first class on flight from the Sackville-West memorial service burial of that legend, in a tradecraft joke he played on the unwitting Lead Plaintiff many years later in the 1990s, shortly before BREYER was being upgraded from First Circuit appellate Judge to Associate Justice on the Supreme Court.

726. While enrolled in the defendant WSU MBA program, Lead Plaintiff met Michael WORTHY, who was then not recognized as having been a key FBI illegally embedded agent working at Larry's Market during the wrecking of Larry's Market, which had been underway as the Lead Plaintiff worked at Larry's Market in 1972-1974 (paragraphs 99k, 418, 422, 493, 726, 762 table, 770, 805AG, AK). WORTHY (defendant FBI) was identified through his appearance in a still photograph with defendant WEISSMAN, which was displayed behind WEISSMAN in 2023, during an MSNBC television interview with defendant MELBER). Other defendant FBI and CIA agents also attended WSU MBA graduate school, included EPSKAMP, WORTHY, ZOULAS, and THORPE, who reappeared in various roles during Lead Plaintiff's professional employment over the following twenty-five years.

727. Lead Plaintiff was referred by his WSU MBA professor Dr. Paul Shaffer (CIA faculty embed), to Deloitte Denver, who then further referred him to Deloitte Seattle which he joined in August 1979, working as an auditor for about six months, then as a consultant, and later as a consulting Manager. This Deloitte Seattle commercial cover operation, actually hosted by defendant USMS, provided commercial covers for CIA commercial cover international espionage projects, and for FBI domestic spying and investigations (Appendix 2 paragraph 1-010 through 1-012).

#### C. Defendant WASH State of Washington

728. Defendant State of Washington (WASH), including various unknown state agencies and local government units to be identified in discovery, which were funded and enlisted by WASH, deployed and detailed current and former government employees in various positions in cover entities used to employ or which permitted volunteer service by Lead Plaintiff to maintain the appearance of normal personal, educational, and professional life, while actually sustaining Lead Plaintiff's involuntary servitude at all times. Nearly all the defendant WASH state and local

government employees later returned to publicly visible positions in state and/or local government employment, most probably never having actually left such employment for the cover positions to which they were deployed to provide logistical support to the illegal BRMT bioweapon and bioweapon delivery system program and associated-in-fact enterprise pattern of racketeering acts and conspiracy, including conspiracy against rights. This pattern continued from the time of the Lead Plaintiff and his family of origin's return to Washington state in 1963, from surreptitious FBI employment at Pacific Paper Products while in CA, to defendant FWSD for third grade elementary school until he left WSU MBA graduate school in June 1979, and was then employed in August 1979 by Deloitte Seattle.

729. These defendant WASH state funded departments agencies and governments were most probably supported by DOJ and other federal grants to provide this logistical support to the illegal BRMT program in support of defendant BREYER's program management in Washington state. Participating defendant WASH departments and agencies included, without limitation, defendant WASH Governor's Office (WASH state employee Terry Buckles in 1973-74, also later known as Wolfgang Opitz), Washington State Human Rights Commission (Terry Byington, who acted as AeA Executive Director during Lead Plaintiff's fraudulent employment at LazerSoft and CNA, paragraphs 729, 735, 762 table), Green River Community College (among others, Terry Buckles, Washington Library Network, later known as Wolfgang Opitz, staff of WASH Governor Locke and Office of Financial Management), and David BRUNTON and Donna DICKOVER during Lead Plaintiff's GRCC 1973-74 freshman year.

730. BRUNTON and Donna DICKOVER then transferred with Lead Plaintiff to defendant WSU Washington State University during undergraduate studies in 1974-77. Lead Plaintiff's Perham Hall dormitory resident, resident assistant, neighboring Perham Hall floor

resident assignments, and his class assignments, were constructed to accommodate the illegal BRMT bioweapon and bioweapon delivery system program. Defendant WASH also provided further personnel resources in the Spokane area, including several individual employees who posed as BREYER family members when BREYER appeared there as Jack SACKVILLE-WEST while ostensibly working as a Spokane area public facilities architect who lived at 1424 S Maple Street, Spokane, WA, while Lead Plaintiff attended defendant WSU, an independent agency of defendant WASH.

731. Terry Buckles, paragraph 729 above, reappeared as Wolfgang Opitz, Governor Locke's supposed advisor on Higher Education, who then moved to the Office of Financial Management, all while the Lead Plaintiff conducted the Higher Education Task Force for the American Electronics Association (AeA), then directed by detailed WASH employee Terry Byington, during the Governor Locke administration (paragraphs 729, 735, 762 table).

732. Laurie DOLAN was fraudulently presented with others as a daughter-in-law married to son David (supposed son of Jack) SACKVILLE-WEST in Spokane, WA beginning in Fall 1974-77 (paragraphs 111, 211, 805AT). DOLAN later joined her fellow defendant WASH state employee college classmate Governor Chirstine Gregoire in 2005 as the governor's Chief of Staff and may have served on Gregoire's staff while Gregoire was defendant WASH Attorney General.

733. The Governor Spellman administration detailed Joseph L. McGavick as a Director in the Deloitte Seattle cover company office run by defendant USMS personnel and HOPPER in support of defendants UNITED STATES, DOJ, FBI, CIA, and ARMY in the early 1980s.

Defendant WASH conspired and participated in the illegal human trafficking process and BRMT bioweapon and bioweapon delivery system program involuntary servitude imposing forced labor

on Lead Plaintiff through these acts, violations, and injuries in support of defendant BREYER, the illegal BRMT bioweapon and bioweapon delivery program, and defendant UNITED STATES' illegal human subject medical experiments on Lead Plaintiff and others in this class of plaintiffs.

734. A then former political aide to defendant WASH Governor John Spellman,
McGavick was deployed to Deloitte Seattle from 1979 to approximately 1983, and while there
worked with Lead Plaintiff and assisted in the deployment of illegal defendant FBI general
surveillance operations into the City of Tacoma, Tacoma Public Utilities, City of Bellevue, Pierce
County, Clallam County, Thurston County, Seattle School District, all in Washington state, and
Buffalo New York School District, Spring Texas School District, San Francisco School District,
the latter with Bannon (defendant CIA, then known as Timothy C. Easton, Deloitte Seattle
Manager, then Director). McGavick returned around 1983 to state employment at the
Washington State Liquor Control Board as a Commissioner. McGavick also orchestrated
deployment to Deloitte Seattle, for a time, of retired Seattle School District Superintendent
David Moberley who worked as a contractor, and of the Seattle School District's former chief
finance officer Pat Moyer, who worked as a project manager. A former Spellman administration
era Washington State Treasurer was also detailed to Deloitte Seattle for about 18 months.

735. AeA Executive Director Terry Byington, another assigned defendant WASH employee, was deployed from the defendant WASH Human Rights Commission. Byington returned to state employment at Lake Washington Technical College after acting as a security picket and contact of the Lead Plaintiff while he was at LazerSoft in Bothell from 1987-89, where the company had been relocated from north Seattle, WA by then CEO Stone (CIA,

working with BURNS) in 1987, and again while the Lead Plaintiff was at CNA in Bellevue, WA, employed by defendant FAUCI.

736. These and other illegal involuntary servitude federal cover company fraudulent employment operations including, without limitation, Deloitte Seattle, LazerSoft, PAN, Pacific Pipeline, CNA, and ESTABLISH, were typically run day-to-day by defendant USMS for use as cover operations by various defendant UNITED STATES departments and agencies including, without limitation, DOJ, DHS, DOD, CIA and other police powers operations of defendant UNITED STATES. Based upon tradecraft security backcheck comments made by Dave Brown, an employee at CNA, Rod Proctor was most probably the actual defendant DOJ/USMS manager overseeing the AeA technology industry trade association cover operation and Byington in Washington state, which included Ian McGregor, a defendant FBI agent posing as a contract lobbyist, who ran intelligence probes against defendant WASH government legislators, departments, and agencies, and at one point instructed the unwitting Lead Plaintiff to time a specific campaign donation at a particular time, apparently as part of one of those probes. Proctor's cover was Redmond, WA based analog to digital telecommunications technology cover company Tone Commander, most probably formed, funded, and sustained by defendant USMS in the aftermath of the 1982 AT&T telecommunications breakup, to facilitate intelligence operations and illegal general surveillance and *Fourth* Amendment violations.

737. Paragraphs 737 through 739 are reserved.

#### D. Defendant KCSD - King County Sheriff's Department

740. Defendant King County Sheriff's Department (KCSD) acted and conspired against plaintiff's rights in support of the criminal and illegal operations of defendant UNITED STATES (DOJ, FBI, CIA, ARMY, USMS, DHHS, NIH, NIAID, BREYER, WEISSMAN, ROSENBERG, HOOPER, BURNS, FAUCI, and other defendants named herein) throughout these plaintiffs'

tenure in King County, Washington beginning in the 1950s (paragraph 1, 805L, 833E), under Directors Hoover (FBI, #1) and Helms CIA, #8), and continuing under Director Wray (FBI, #8) and Burns (a direct perpetrator individually named herein, now Director, CIA, #16), with evidence to be provided subject to discovery. Among the myriad acts, violations, and injuries in this complaint, Sandra Darlene Brewer, age 11, was administered a lethal dose of codeine and aspirin in Federal Way, WA, deliberately inducing Reye Syndrome (paragraphs 417, 803, 805), and died within 48 hours in a Pierce County, WA hospital in April 1970, at the hand of an embedded medical doctor KOHLER (paragraphs 99d, 417, 418, 714, 740, 803C-D, 805B(i), H, S, BS, 806B, 814B) working within or on behalf of defendant UNITED STATES illegal BRMT bioweapon and bioweapon delivery system program (which then coexisted with defendants ARMY Bioweapons Lab and CIA's illegal LSD drugging program MKUltra run by Dr. Sidney Gottleib) while it was managed by defendant BREYER.

741. This corrupt police powers conspiracy continued at least throughout the tenure of Lead Plaintiff and his extended family in King County, WA between 1955 and 2005 under the series of defendant KCSD Sheriffs, much as the Pierce County WA Sheriff's Department conspired with the Carbone crime family for decades in adjacent Pierce County, WA until the late 1970s, when Sheriff Janovich was indicted and convicted only after ATF uncovered the Carbone/Pierce County Sheriff's department relationship and turned over its investigation to defendant FBI, which had previously ignored Pierce County for years despite dozens of numbers-racket, prostitution, and related tavern arson fires in and around the federal Fort Lewis/McChord military bases.

742. Unlike Pierce County, where the US Attorney for Western Washington eventually brought criminal charges and secured the conviction of Sheriff Janovich for that decades long

criminal racketeering conspiracy, this corrupt conspiracy in King County, WA was never prosecuted, even after the Lead Plaintiff visited and personally served an FTCA complaint letter on the US Attorney for Western Washington office in 2005, never answered (paragraph 320), because it involved illegal operations conducted by defendant UNITED STATES, DOJ, and other federal departments and agencies as the principal conspirators in this criminal conspiracy against the Lead Plaintiff and his extended family. This defendant DOJ fraudulent concealment pattern has been repeated in the Eastern District of Massachusetts from 2005-2007, District of New Jersey since at least 2007 (paragraph 320) and the Southern District of New York at least since 2018 (paragraph 320, 550-584), as well as in federal district courts in those two districts, and in the District of Columbia (Appendix 1).

743. Defendant KCSD Deputy David REICHERT joined defendant KCSD as a deputy in 1972, around the same time his subordinate Gregory R. Boyle joined defendant KCSD. REICHERT progressed through the ranks and was elected Sheriff from 1997 until 2005. Reichert worked with Boyle as a trusted subordinate for many years as a patrol deputy, detective, task force leader, and other assignments in the department. Boyle served under REICHERT as a Green River Task Force detective which tracked the King County serial killer, then as the task force leader, and later as Maple Valley Precinct Commander. Boyle was the first and second husband of Lead Plaintiff's romantic partner and first wife Lynne. Boyle and Lynne shared two daughters who were pre-teens when Lead Plaintiff first met them.

744. REICHERT's 1972-2005 KCSD tenure encompasses the period from Lead Plaintiff's first employment as a teen in 1972 at the defendant FBI infiltrated and secretly co-owned Larry's Market (paragraph 418), through his graduation from the BREYER/BRMT corrupted defendant FWSD Decatur High School in 1973 (paragraph 716) to the end of

BREYER's tenure as Lead Plaintiff left graduate school in 1979, through Lead Plaintiff's introduction to Boyle's former wife Lynne Boyle, orchestrated by BREYER, HOPPER, and unknown others at the illegal cover company Deloitte Seattle (paragraph 609 HEXP-6), through Lead Plaintiff's marriage to Lynne and his support of Boyle's two daughters from pre-teen to college and departure from the family home, through the subsequent destruction of the Lead Plaintiff's marriage to (paragraph 609 HEXP-6) in 1987-88, soon after Boyle's two daughters had left home for college, and through his subsequent orchestrated fraudulent marriage to Jeanette (ARMY) orchestrated by CIA's BURNS, WATERS, and other defendants, and through the following years of depredations to and including the torture to suicide ideation sequence by FAUCI and others in the early 2000s, before REICHERT departed for Congress.

745. This 1972-2005 King County, WA time period also includes Lead Plaintiff's orchestration in 1988 (by defendants WATERS and BURNS, and unknown others) and subsequent fifteen years of the fraudulent marriage to Jeanette from 1990-2005 (paragraph 610 HEXP-7), when defendants ROSENBERG, FAUCI, PRAY, CALDWELL, and other defendants orchestrated his final divorce, psychological and financial destruction, and human trafficking to Boston, MA in December 2005.

746. Between 1979 and 2005, this time period in King County, WA, also included numerous severe injury to lethality attempts while he lived at NE 113rd Street in Redmond, WA with Lynne, at 149<sup>th</sup> Street, Kirkland, WA with Jeanette adjacent to the defendant BURNS' residence (paragraph 695 LETHL-2), which period included, without limitation, an entrapment operation at Stevens Pass (paragraph 621 RGTS-1) multiple fraudulent employments in defendant UNITED STATES illegal cover operations in King County (paragraphs 600-603 NSEC-1-3) as well as the financial, sales, litigation, and bank frauds used to destroy multiple

private enterprises of Lead Plaintiff in King County (paragraphs 639-641, 645, 649-653 RICO-1-3, 7, 11-15), and nearly the entire coercive psychological operations/torture/suicide ideation sequence by defendant FAUCI and co-conspirators in 2002-2005 (paragraphs 403-464, 490-520).

747. REICHERT was born in Detroit Lakes, MN, and knew and was known to Orland Howard, an associate of CORNWELL (defendant CIA) at PAN. Howard reported to Lead Plaintiff in 1993-94 while Lead Plaintiff was PAN Chief Operating Officer during those defendant UNITED STATES employment and compensation frauds against Lead Plaintiff, as conspired and perpetrated by defendants UNITED STATES, CIA, FBI and unknown individual defendants to be identified, paragraphs 450-451, 601 NSEC-2. Howard allegedly operated a railroad right-of-way recycling operations known as Northwest in Detroit Lakes, MN, which disposed of old telegraph lines from mainline railroad rights-of-way and was one of three businesses placed under the PAN umbrella for an alleged financing, (and CEO Cornwell, CIA) which was actually a defendant CIA/FBI fraudulent cover company operation used to sustain involuntary servitude and to pretext and entangle Lead Plaintiff in another of these defendants' series of fraudulent enterprises, financing, and cross-border activities with RCMP, CSIS, MI-5, MI-6, and London Metropolitan Police, as described at paragraph 601 NSEC-2.

748. REICHERT replaced Dunn in the US House of Representatives in 2005 and remained there until 2019. REICHERT's departure from defendant KCSD to Congress came less than 12 months before the Lead Plaintiff was human trafficked in December 2005 from King County, WA where he had lived from 1955-1961 and 1963-2005 to Boston, MA. Representative Dunn had conspired in her role in Congress, including by conducting the behavioral baseline interview in Washington, DC in support of the subsequent episodes of torture by FAUCI

described in paragraphs 604-607 HEXP-1-4, to support the involuntary servitude process on behalf of the Bush administration and defendant DOJ under Attorney General Alberto Gonzales.

749. As REICHERT began serving in Congress in 2005, DOJ AG Gonzales placed defendant ROSENBERG as US Attorney for South Texas briefly in 2005-2006 during the 2005 human trafficking before moving him to the US Attorney for Eastern Virginia so he could then act in the role of ESTABLISH General Manager as Lead Plaintiff was trafficked to Fort Lee, NJ from Boston in August 2007 for further illegal BRMT bioweapon and bioweapon delivery system abuse to and including torture and suicide ideations and coercive kidnapping for the explicit purpose of coercing dismissal of federal civil rights litigation in 2010-11.

750. The King County, WA based portion of the on-going FAUCI (UNITED STATES, NIAID) led illegal BRMT bioweapon and bioweapon delivery program and defendant FBI-led rights and racketeering operation against Lead Plaintiff was shut down in 2005. Principal elements of this late 2004-2005 shut-down year operations were (i) forced fraudulent spouse Jeanette moved out and divorce from Jeanette was completed, (ii) the forced sale of the NE 149<sup>th</sup> Street, Kirkland, WA residence occurred as the wrecking of Allegent, LLC was completed, (iii) remote BRMT inflicted torture sessions were undertaken at 149<sup>th</sup> Street, and (iv) then again at the 124<sup>th</sup> Avenue NE, Kirkland, WA apartment to which Lead Plaintiff was surreptitiously forced to relocate after the local illegal BRMT bioweapon and bioweapon delivery system psychological operations and security detail vacated that 84 unit apartment complex and a nearby office building on Slater Avenue NE, abandoning their government-owned undercover vehicles in the apartment building's parking lot. A brief stay at his sister's house in Edgewood, WA resulted in direction from a carefully placed faked family member there that he was not

welcome, also the moment of a cameo as Aunt Joanne by PBS media personality Judy Woodruff, which led to a decision to leave the area out of fear for his extended family's welfare.

751. As REICHERT served in Congress in 2005, Lead Plaintiff was human trafficked, by coercion and bait, to carefully pretexted Boston, MA (paragraph 276A, 320e, 46, 462-464).

Defendants UNITED STATES, DOJ, FBI, USMS, CIA, ARMY, ROSENBERG, FAUCI, and unknown others, having lost local police powers support in King County, WA, had conspired and organized Lead Plaintiff's human trafficking in December 2005 to Boston, MA and 21 months of homelessness, and to a new round of torture (paragraph 605 HEXP-2), with the assistance of SUMMERS, formerly known as Roger Penner when he was briefly at Deloitte Seattle in the early 1980s, paragraph 463.

752. Defendant KCSD, including Boyle and REICHERT, acted illegally in conspiracy with defendant UNITED STATES, and with ARPAIO as MARICOPA SHERIFF from 1993-2017, to support this entire operation during Lead Plaintiff's tenure in King County, Washington, which continued until December 23, 2005, and during his frequent visits to Maricopa County, AZ to visit Boyle's daughter Debora (Lead Plaintiff's stepdaughter while married to Lynne) after the marriage to Lynne had been ended in 1988. Boyle is alleged to have died in Sun City, AZ in the later 1990s within the jurisdiction of defendant ARPAIO while MARICOPA SHERIFF, but that event of death from lung cancer has not been confirmed. Evidence of widespread fraudulent concealment of illegal acts by police powers operations has been and remains clear and apparent throughout the pre-discovery forensic review conducted to prepare this complaint.

753. Sue Rahr, who was first employed by defendant KCSD in 1979, succeeded Reichert as Sheriff in January 2005. Based upon her other record of service in police powers operations and subject to discovery, Rahr was plausibly unwilling to perpetuate the local police powers

conspiracy which had been continued under Reichert. According to the Seattle Times, Rahr "served 33 years with the King County Sheriff's Office and nine years as the executive director of the Washington State Criminal Justice Training Commission. She co-authored "From Warriors to Guardians — Recommitting American Police Culture to Democratic Ideals." "

754. Rahr's election as Sheriff ended defendant KCSD protection of this conspiracy. Defendant KCSD including, without limitation, REICHERT while sworn deputy, then Sheriff, and Boyle while sworn deputy, had acted in conspiracy with defendant UNITED STATES (DOJ, FBI, CIA, ARMY, FAUCI, ROSENBERG, and unknown others) to sustain operations of the illegal BRMT bioweapon and bioweapon delivery program in its associated-in-fact enterprise pattern of racketeering acts, rights violations, and other acts, violations, and injuries, from the 1950s through the 2005 human trafficking of Lead Plaintiff from King County, WA, and thereafter with ARPAIO and MARICOPA SHERIFF.

755. Paragraphs 755 through 759 are reserved.

# E. Summary – Lead Plaintiff's Relationships With Federal, State And Local Governmental Defendants

760. Defendant UNITED STATES, DOJ, DOD, CIA, ARMY, NIAID personnel and senior executives both directly perpetrated and supervised illegal BRMT bioweapon and bioweapon delivery system field development test and deployment; constitutional, civil and human rights violations; and racketeering acts, violations, and injuries; all in conspiracy with state and local governments and their employees, in various states where Lead Plaintiff and other plaintiffs have and do reside, work, worship, and conduct other activities of normal life. There is a clear long-running pattern of an associated-in-fact enterprise pattern of racketeering acts and violations of constitutional rights conspiracy, which these individual defendants have and do manage and operate, and which criminal acts and civil injuries are systematically fraudulently

concealed and persistently not prosecuted by defendant DOJ since at least 1961 (paragraphs 550-584).

761. This pattern and the progression of promotions of these personnel from field operations to executive branch senior civil service positions, cabinet officer positions, to judicial, and to congressional roles demonstrates broad senior management awareness among these institutional defendants in various federal, state, and local roles identified herein, reaching back at least to human trafficking for defendant FBI Cointelpro evidence destruction in 1961 (paragraphs 414-416) through Lead Plaintiff's direct human trafficking by ARMY religious discrimination (defendant BREYER, Gary JACK) in 1968 at age 12 paragraph to the present time (Appendix 2 timeline and entirety of complaint narrative at paragraphs 1-37, 403-571).

762. A summary table of the various individual defendant roles, their varying institutional defendant employment and affiliations, and their relationships to the Lead Plaintiff, which are representative of these relationships with other plaintiffs of this class, in defendants' systematic pattern of constitutional rights violations and associated -in-fact enterprise pattern of racketeering acts, for which Congress and state statutes have assigned individual defendant liability at, without limitation, 28 U.S.C. § 2679(b)(2) and 42 U.S.C. §§ 1961-1968, as further described in paragraphs 267-306, follows:

Individual	<b>Executive Management</b>	Field Cover Identity	Notes: Security
Official	Role, Governmental	And Role – paragraph	Backcheck –
	Employer (Known or	reference	Operational and
	Presumed)	(LP is Lead Plaintiff)	Personal
Janet Reno	US Attorney General,	Lakeland Elementary	Janet Reno back
	DOJ	School LP sixth grade	check conducted in
		fellow student named	2014, including
		Martha under teacher	brother Charles
		Simpson, 1966-67, FBI	Jackson (CIA), who
			was probably Bruce
			Zuelsdorf at Lakeland
			Elementary or Lakota

			Junior High School, Federal Way, WA in 1960s
Gary Jack	Unknown, ARMY	1968 CA campground BRMT oxytocin incident with LP (paragraph 417)	Army buddy of LP father Don, same church (whether infiltrator or otherwise is unknown)
Unknown – Lani Fish, Dorothy Fuller	Unknown, DOJ	Lani Fish, Lakota Junior High School, also played french horn alongside LP 1968-70 and oxytocin incident paragraph 415. Later Dorothy Fuller 1988 – paragraph 610A HEXP- 7	Fuller was interim romantic interest who held LP between Lynne and Jeanette during this Burns (CIA/ARMY) marital wrecking and fraudulent forced marital community
Unknown – Brad red hair and mustache FBI at Larry's Market, later Mike Worthy	FBI	Clerk, Larry's Market, later Michael Worthy WSU MBA, appeared in FBI group photo with Weissman paragraph 99k	
Wolfgang Opitz	WASH Staff Advisor to WA Gov. Locke, then WA Office Financial Management senior manager	Terry Buckles WASH Washington Library Network employee while LP at GRCC paragraph 718. Later Wolfgang Opitz, WA Gov. Locke higher education advisor, OFM senior manager, paragraph 729	
Stephen Breyer	ARMY Intelligence, illegal BRMT program manager, appellate Judge, then Associate Justice US Supreme Court	Fraudulent church Elder Snow, 1970-72, and supervisor of NE Tacoma fraudulent church, then Jack Sackville-West, Spokane, WA from 1974, paragraphs 21(i), 36 table	Stanfield Turner 1979 walk-by at NGA East Building Rotunda, then Jack Sackville- West post memorial service flight upgrade from Spokane to Seattle, shortly before BREYER was upgraded from First Circuit appellate court

Neal K. Katyal	DOJ, Acting Solicitor-	Shawn Morrissey, LP	to SCOTUS, paragraph 725 Injured in bareback
	General	fellow student Decatur High School in 1970- 71, part of BREYER BRMT team.	fall from horse at Caudle farm during horse riding informal training with Grady by LP, injured in the same time period as the death of LP's sister Sandra and injury to her surviving twin sister Susan
Andrew	FBI, DOJ EDNY Asst US	Embedded in	Part of BREYER
Weissman	Attorney, FBI General Counsel under Mueller	cooperative management at Associated Grocers during Larry's Market employment and wrecking, then PCC as GM during LP Board service	BRMT team
Merrick Garland	FBI/USMS/DOJ, Judge DC Appeals Court, US Attorney General	Fellow undergraduate student Robert Mandich WSU 1974- 76, plausibly fellow student Stuart Bettesworth, Decatur High School 1971-72, part of BREYER BRMT team	Bettesworth had an alleged relationship with Mariam Backman, a likely BRMT victim, see paragraph 717 for her other plausible identities across time
Laurie Dolan Chief of Staff to WA Gov. Gregoire, who was also WA AG prior to her service as Governor	WASH, Chief of Staff to WA Gov. Gregoire, also possibly on staff while Gregoire was WA Attorney General	Sackville-West family member by marriage to David, infant daughter Anne	
Hamid Bahari- Kashani	CIA asset, family closely associated with Shah of Iran and SAVAK secret police	Economics PhD graduate student, LP WSU office mate as CIA asset, served as pretext for LP's continuing national security entanglements	Richard Helms was CIA Director 1966- 1973 while BRMT BREYER operated on LP at age 12 in 1968- 73 and family. Helms was Ambassador to

Gerald L. Thorpe	CIA field operations with Bannon, Blair	by CIA, FBI at WSU. LP's family entangled since by ARMY and CIA in early 1950s, FBI cover company Pacific Paper Products 1961-63 WSU MBA, later Deloitte Seattle, then to Deloitte Riyadh Saudia Airlines info tech project (CIA)	Iran 1973-76. LP assigned to co-office at WSU MBA with this CIA Iranian asset in 1978-79
John L. Zoulas	CIA field operations Caribbean, WSU MBA, then Westin Corporate Seattle - CIA	WSU MBA, then Westin Seattle	Pretexted LP into Queen Elizabeth II Seattle visit national security event 1983
Lisa Desjardins	Media, now PBS Congressional Correspondent	Allene Sampson, while LP was WSU MBA student	Possibly reintroduced an emotionally frustrated Mariam Backman (from Decatur H.S. one year behind LP and former girlfriend of Stuart Bettesworth) as a Tacoma-area teacher seeking her M.Ed. at WSU during Summer 1978, whose other plausible identities are at paragraph 717. Sampson reappeared near Hisyasu's Kirkland, WA condo during Lead Plaintiff's several months stay there in the early 1980s
David Reichert/ Gregory R. Boyle 1979- 2005	KCSD Reichert and Boyle rose together from patrol to detective to Task Force to Precinct to KCSD Sheriff Reichert, later Congressman Reichert	KCSD Boyle was former husband of first wife Lynne, Reichert was immediate superior of Boyle throughout the King County based BRMT program operations, from 1979 to 2005	Field operations from 1979-2005 in WA were terminated shortly after Reichert left for Congress. LP was trafficked to Boston within 12 months after Rahr assumed the KCSD

			Sheriff role (paragraphs 743-752)
Joseph L. McGavick	WASH Staff to WA Gov. Spellman, then returned to WASH as Commissioner, WSLCB	Director, Deloitte Seattle	(paragraphs 7 13 732)
Steve Bannon	CIA field operations, EOP under Tump, media	Timothy C. Easton Manager, then Director, Deloitte Seattle	Served as Thorpe's field supervisor at Deloitte Seattle on Central America and Micronesia commercial cover projects, CIA
John R. Blair	CIA field operations	Director Deloitte Seattle, then to Honolulu to support Micronesia projects, then to	Served as Thorpe's field supervisor at Deloitte Riyadh Saudia Airlines info tech project, CIA
Roger Stone	CIA field operations, Republican Party consultant, political operative	David P. Moller Manager, Deloitte Seattle; then CEO, LazerSoft, employed LP as CFO	South Africa ATM project around 1983- 85, then to LazerSoft around 1985, where LP was pushed and employed 1986-89
Warren Wilkins	ARMY, WA ANG Colonel	Sales Representative, LazerSoft	Pre-positioned by Stone at LazerSoft before LP became its CEO when Stone removed
R. Kent Tarpley	Plausibly local government at City of Bellevue public utilities, DOJ/FBI/USMS embedded at LazerSoft	Plausibly City of Bellevue cover while LP at Deloitte Seattle, LazerSoft VP Operations under Stone and LP	Pre-positioned by Stone at LazerSoft before LP became its CEO when Stone removed
Stephen Waters	DOJ/FBI/USMS	Embedded as software contractor at LazerSoft 1987-89	Conducted introduction of Jeanette, who became LP's second spouse
William Burns	BRMT program manager, CIA Director	J. Patrick Heffron, Director, Investor, LazerSoft	
Chuck Rosenberg	FBI, US Attorney, Southern District TX then US Attorney Eastern VA,	Chick LeFevre, CEO, NutraSource. Placed in role by Weissman FBI. Later General Manager	Part of BREYER, BURNS, FAUCI BRMT teams

	then DEA Acting Administrator, all at DOJ	Establish, Fort Lee, NJ where LP was trafficked from Boston, then terminated	
Terry Byington	WASH Human Rights Commission staff, AeA, then WASH Lake Washington Technical College staff	AeA Executive Director	Provided physical picket duty adjacent to LazerSoft – Bothell 1987-89, and provided around 1999-2003 Higher Education Task Force support to LP to access WASH political establishment during LP tenure in King County, WA
Anthony Fauci	NIAID Director, DHHS	Alleged CNA Founder, present throughout LP's CNA employment	Persistently described Banner Bank Bothell as a financing source. LP's uncle worked in that same shadow bank unwittingly during the same time period
Lloyd Austin	ARMY General Officer, Secretary of Defense	CNA Project Manager on HomeGrocer.com Renton, WA distribution center around 1999	
Alexander Vindman	ARMY, Lt. Colonel, National Security Council staff	Jeanette blended family brother-in-law, 1992- 2004	
Ari Melber	FBI, SDNY Asst. US Attorney, DOJ, MSNBC media anchor	Wes Lewis, husband of Theresa, Jeanette blended family brother- in-law 1992-2004, FBI	
Lisa Rubin 92- 04	FBI, SDNY Assistant US Attorney, DOJ, MSNBC media commentator	Michelle Yarbrough, Jeanette blended family sister-in-law 1990- 2004, FBI	
Orland Howard	Unknown police powers affiliation, possibly KCSD	CEO, Advantage, a PAN subsidiary, reported to LP and Cornwell (CIA), 1993- 94	Same hometown, similar age to Reichert, then a senior KCSD commander. Likely an associate from small town

	1	I	
			Detroit Lakes, MN, or
			a KCSD deputy using
			this as cover legend
Gil	Reported to Attorney	Seattle Chief of Police,	Administered
Kerlikowski	General Reno while at	crosswalk LP	community policing
	DOJ, later EOP Drugs	sightseeing once in	grants used to sustain
	Czar, then Commissioner	Seattle while LP under	cooperation and
	Customs and Border	continuing perpetual	support illegal BRMT
	Protection (CBP) at DHS,	surveillance, around	and racketeering field
	then Seattle, WA Chief of	2004-05.	operations in King
	Police		County, WA under AG
			Reno
Raymond	US Customs and Border	Private Attorney,	Operated as LP's
Sullivan	Protection investigator	International Trade	Winnett counsel
Sumvan	and attorney, possible	International Trace	2013-2020,
	descendant of 1977-79		introduced by Charles
	Ambassador to Iran		Jackson (RENO's
	Sullivan, who assumed		brother) in December
	that role and was recalled		2013, four months
	to DC prior to the hostage		before Kerlikowski
	crisis. LP shared office		(then EOP Drug Czar)
	space with CIA Iranian		was confirmed to
	asset at WSU MBA 1978-		Commissioner, CBP
	79		in March 2014
Robert	FBI, Assistant Attorney	PPG Industries	Supervised 13 years
Mueller	General Criminal	headquarters building	of FBI racketeering,
Widelier	Division 1990-93, US	Pittsburgh security	including LP
	Attorney Northern	backcheck on LP	enterprise wrecking,
	District of CA, where he	conducted with	and human
	supervised Caldwell	Rosenberg in 2007	trafficking, with
	between 1998-01, then	while LP fraudulently	WEISSMAN and
	<b>FBI Director</b> 9/4/2001 –	trafficked and	ROSENBERG in
	9/4/2013	employed at captive	field and later
	7/4/2013	cover company	executive roles, both
		Establish, Fort Lee, NJ	FBI. Mueller
		Establish, 1 of t Ecc, 143	conspired with
		Rosenberg was	FAUCI, NIAID, CIA,
		previously embedded	ARMY who engaged
		as CEO NutraSource	in marital wrecking,
		by Weissman while at	torture, and other
		PCC. Rosenberg was	violations
		chief geographic and	VIOIAHOIIS
		employment trafficker,	
		and repeat enterprise	
		wrecker for FBI in WA	
		and NJ	
		aliu inj	

Darrell C. Pray	DOJ/FBI/USMS field agent	Weissman served as General Counsel and other key functions under Mueller Embedded DOJ/FBI/USMS agent at CSC, FSA, NutraSource, Pacific Pipeline, Allegent	Long term associate of Rosenberg, FBI. Pray was supposed Allegent LLC coowner in FBI ShipNow and TSL racketeering of LP's Allegent
Leslie Caldwell	DOJ EDNY Asst US Attorney with Weissman, SF Asst. US Attorney under Mueller, Assistant Attorney General Criminal Division 2014- 2017	Intellectual Property Attorney, Seed & Berry	Falsely presented as Seed & Berry legal counsel to secretly co- owned Allegent LLC, concealing FBI direct action ShipNow multiple check frauds and Caldwell litigation fraud against LP interests in interstate commerce
Joseph Arpaio	DEA – Latin America, Arizona, then Sheriff Maricopa County	Greg Crossgrove, Produce Industry Consultant. Arpaio as MCSO Sheriff also plausibly provided venue for KCSD Gregory R. Boyle alleged relocation and death sequence	Frauds in interstate commerce with federal defendants and MCSO officers
FBI SACs, CIA, ARMY, NIAID, and state and local police powers in 44 states, Canada, UK, France, Switzerland from 1979 forward	Various SAC in numerous field offices coordinated local fraudulent sales call operations in TSL Boston office 2003-04 wrecking/trafficking sequence	Various FBI Field Offices in 44 states, 1979 to 2023	Persistent racketeering frauds in career and enterprise wrecking and illegal surveillance. BRMT lethality and torture events, among others

Judy Woodruff	PBS former anchor.	Aunt Joanne December 2005 at sister's	Cameo during faked sister push operation
		Edgewood, WA home	by Rosenberg, FBI in
			December 2005
			trafficking to Boston
Tom Keene	Bloomberg Media former	Michael Callahan,	Fraudulent Dominick
	anchor	Dominick and	investment banker in
		Dickerman Managing	interstate commerce
		Director	frauds involving fake
			investors and fake
			Walmart organic
			produce sales
			proposals

763. Paragraphs 763 through 765 are reserved.

# State and Local Government Co-Conspirator Employee Crossover Employment - Adverse Impacts On Lead Plaintiff and Other Class Members

766. Defendant UNITED STATES, its cover entities, and corporate entities with embedded defendant UNITED STATES personnel, and state and local governmental departments and agencies, operating within and across state lines in Washington and Oregon, and subject to further discovery as to specific dates, times, and roles, employed other members of Lead Plaintiff's extended family in defendants' associated-in-fact enterprise pattern of racketeering acts and constitutional rights violations including, without limitation, in their abuses using the illegal BRMT bioweapon and bioweapon delivery system for illegal human subject medical experiments without consent, biochemical hijacking, human trafficking, murder, and other racketeering and rights acts, violations and injuries against these plaintiffs and in both legal operations and in their illegal spying, surveillance, and rights and financial wrecking operations against other parties, without limitation, as follows:

(i) multiple Lead Plaintiff romantic interests and partners, and both spouses, paragraphs 608-614 HEXP-5-11, who were subjected to illegal BRMT bioweapon and bioweapon

- delivery system direct manipulations and illegal human experimentation by defendant UNITED STATES.
- (ii) maternal grandparents Don and Madeleine Thompson who both worked at the cooperative Farmer's Union Central Exchange (FUCE, then Cenex) in Auburn, WA, and Don for interstate trucking as an owner-operator and as a driver for a hazardous materials tanker trucking operation, Mitchell Brothers near Portland, OR, as well as two years in northern Montana managing CENEX cooperatives in Shelby, Cutbank, and Valier, MT, the latter most probably related to defendant FBI national security operations related to ICBM and missile defense sites in that region
- (iii) aunt Delores Thompson who worked at the cooperative FUCE (Cenex) in Auburn, WA, and for defendant WASH at the Buckley, WA campus of Rainier School
- (iv) aunt Joanne Brewer who worked for Social Security Administration in Lakewood, WA
- (v) uncle Bruce Brewer who worked as an appraiser in the national security zone Hanford

  Nuclear Reservation after defendant ARMY service, and at the shadow bank Banner

  Bank Bothell
- (vi) father's cousin Larry Brewer- whose grocery store was secretly owned in part by defendant FBI and financially destroyed during WEISSMAN's tenure embedded at Associated Grocers, the regional grocery for independent supermarkets based in Seattle, WA
- (vii) sister's husband Jerry Hansen Boeing, in its model shop which handled classified shapes and parts for wind tunnel testing and similar purposes
- (viii) brother Jeff Brewer who worked for a US military demolition contractor at various facilities in and around Puget Sound, WA

(ix) father Don Brewer - in Boyd's Coffee and in Miller-Cascade (a Stevedoring Services of America affiliate or subsidiary owned by the Smith family and operated at the time by Ricky Smith) which acquired Pacific Gamble Robinson in May 1986 (and thereby the embedded defendant UNITED STATES accounting staff member Christensen, who also worked with defendant ROSENBERG), which was consolidated as Food Services of America (FSA).

#### **Entities With Known Embedded Agent Which Employed Class Members**

767. Lead Plaintiff's father Don was employed by Miller-Cascade as a coffee route sales representative, which consolidated with Pacific Gamble Robinson (where embedded federal officer Christensen had already been working prior to father Don's employment there, and where Lead Plaintiff, Don's son, had been recruited for a position after his undergraduate program at defendant WSU in 1977) into FSA. At some point, defendant UNITED STATES acted surreptitiously through an embedded human resources manager to orchestrate FSA hiring of embedded federal officer PRAY from CSC, where he had been embedded on the CSC Alaska Retirement Systems information services contract in Juneau, AK. Pray installed IBM System 36 minicomputers and software systems at FSA headquarters and its branch locations. As FSA employed PRAY, Christensen, and a CEO whose name is not recollected, the company began experiencing financial difficulties. That CEO was fired, along with Pray and other senior managers, by principal owner Ricky Smith in a manner characterized by Pray as a "hostile takeover." That former FSA CEO then went on to the Portland unit of grocery wholesaler McLane as Smith replaced the FSA management team. Embedded federal officers PRAY and CHRISTENSEN then joined defendant ROSENBERG at NutraSource to continue the illegal spying and wrecking operations against organic and natural foods buying clubs, small businesses, and PCC, which continued well beyond defendant WEISSMAN's initial organization of NutraSource and his subsequent departure from PCC as its illegally embedded General Manager (paragraphs 11, 425-436).

768. Lead Plaintiff had himself previously been recruited to Pacific Gamble Robinson as a regional food service sales representative for southwest Oregon in 1977 while a defendant WSU undergraduate, but declined to accept the position. Lead Plaintiff served on the Boards of NutraSource and PCC while employed at illegal cover company Deloitte Seattle. Lead Plaintiff served on the Board of illegal cover company Pacific Pipeline with defendant ROSENBERG then as Pacific Pipeline COO and employed CHRISTENSEN and PRAY at Pacific Pipeline. Lead Plaintiff also worked at CNA as defendant FAUCI used shadow cover bank Banner Bank Bothell, which was then employing Lead Plaintiff's uncle during the same time period.

769. Lead Plaintiff and defendant PRAY formed Allegent, LLC, and defendant PRAY used another shadow bank in Bellevue name not recollected to fund the illegal co-ownership of Allegent by PRAY, the embedded federal officer in this repeat of the associated-in-fact enterprise pattern of racketeering acts. Allegent was financially wrecked in the course of sequence of defendant FBI financial and litigation entrapments and involuntary servitude and forced labor with co-conspirators CALDWELL and FAUCI. Allegent, LLC had been legally organized by attorney Michael Larson, who also managed the ShipNow and CNA litigation against those entities, which were actually cover entities and illegal operations of defendant UNITED STATES used by defendants DOJ, FBI, USMS, CIA, ARMY, and who (Larson) had been referred to Lead Plaintiff by another embedded federal agent, John C.T. Conte, who had befriended the Lead Plaintiff in 1987 when Lead Plaintiff was seeking investment financing for LazerSoft.

770. This repeat of the associated-in-fact enterprise pattern of racketeering acts at Allegent, LLC, directly links this pattern of racketeering acts back to Lead Plaintiff's original

employment at Larry's Market, Federal Way, WA, co-owned by Lead Plaintiff's father's cousin Larry Brewer in the 1970s, and financially wrecked while secretly co-owned by defendant FBI through an FBI agent who posed as the supermarket's produce manager and business partner. Larry's Market employed a red-haired and mustached clerk, who was later known to Lead Plaintiff as Mike WORTHY at defendant WSU MBA graduate school and thereafter. WORTHY (paragraphs 99k, 418, 422, 493, 726, 762 table, 770, 805AG, AK) appeared in a defendant FBI group photo with WEISSMAN in the home office background behind defendant WEISSMAN during an MSNBC Ari MELBER interview in late Summer or Fall 2023.

# Other Lead Plaintiff Related Class Members' Involuntary Servitude Employment Patterns A. First Spouse Lynne's Employment Pattern

audit of Safeco, where he was assigned as an auditor before joining the management consulting practice. Lynne had completed her accounting degree at the University of Washington in June 1979 and joined the audit staff as a staff auditor. She was employed and promoted normally for three to four years on a series of financial audits. She joined US West New Vector Group, the cellular telephone spin-off from AT&T a few months after the Lead Plaintiff had trained the accounting manager during the initial start-up of the spin-off in Bellevue, WA. Her employment there soon after Lead Plaintiff's training sessions is now understood to be an element of the conspiracy, not a coincidence. It was another step in the illegal BRMT bioweapon and bioweapon delivery system development process, as local BRMT bioweapon devices were illegally concealed in cellular telephone equipment boxes (full duplex transceivers) installed in both family vehicles by SWAIN, the installation shop then used and later purchased by US WEST New Vector Group. These and other locally installed systems were used to trigger various illegal human medical experiments including, without limitation, the Stevens Pass entrapment

attempt (paragraph 621 RGTS-1), the Porteau Cove double murder attempt (paragraph 694 LETHL-1), and the SWAIN marital breakup (paragraph 609 HEXP-6).

## **B. Second Spouse Jeanette's Employment Pattern**

772. Lead Plaintiff met Jeanette, his fraudulently orchestrated and coerced second spouse (coerced bisexual ARMY active duty deferred military criminal prosecution status), while she was temporarily employed as a receptionist at First American Title Insurance Company (FATCO Bellevue), Bellevue, WA in 1988, during a defendant UNITED STATES operation orchestrated by defendants FBI, CIA, ARMY, WATERS, BURNS and unknown others. Soon thereafter, Jeanette transitioned from temporary contract employees status and became permanently employed at FATCO Bellevue, working alongside embedded co-worker Laurie Vanderberry, the wife of Kerry Vanderberry, then known to be a defendant FBI agent on the bank robbery squad in the Seattle field office. Jeanette frequently mentioned her difficulty in engaging in role playing sessions in office training. This became an apparent psychological inhibitor, most probably actually a form of illegal BRMT bioweapon and bioweapon delivery system mental torture by defendant BURNS (the cross-street resident on 149th Street), to her continued employment with First American in 1994, sometime after a November 1993 family bankruptcy caused by defendant UNITED STATES destroying Alliance, paragraph 610 HEXP-7, 649-651 RICO-11-13.

773. Jeanette left First American and operated as an independent ACT software consultant from around 1994, during which she experienced long hours and frequent bouts of mental confusion by illegal BRMT bioweapon and bioweapon delivery system hijacking in these defendant CIA, ARMY, NIAID, BURNS, and FAUCI illegal human subject biomedical experiments. During this period, she worked with a variety of clients including her former FATCO Bellevue client real estate sales agents and brokers, which included illegally embedded federal police powers personnel, as well as Key Technologies in Walla Walla, WA, where Lead

Plaintiff's cousin Burt and family were under the surreptitious surveillance, and most probably illegal BRMT bioweapon and bioweapon delivery system brain biomanipulations, which were also most probably being used in abuse of the Lead Plaintiff's uncle Bruce's family in the Tri-Cities, WA region (Hanford Nuclear Reservation national security zone). Jeanette also worked at Alaska Brewing in Juneau, AK, and with the Kemper Freeman real estate development company. In each of her clients, she dealt with sales contact databases which could easily be illegally accessed by defendant FBI, USMS and other federal police powers and intelligence operations to engage in illegal remote spying on those companies and those companies' own customers through accessing Jeanette's database downloads for her customization projects undertaken for those clients.

# C. Father Don's Employment Pattern

774. Lead Plaintiff's father, Don, worked at Nelson Lumber and Hardware as a part-time job, then full time after high school in Enumclaw, WA until drafted during the Korean War by defendant Army where he served as a medical corpsman, returned to Nelson Lumber and Hardware, then went to Fibreboard, Sumner, WA, followed by employment in defendant FBI's captive cover company Pacific Paper Products, Tacoma, WA, (1961-63) unwittingly assisting FBI to destroy evidence of its Cointelpro program violence in northern and then southern California; followed by defendant FBI handling which continued at Smith Brothers Dairy, Kent, WA as a route deliveryman, where he later purchased a Des Moines, WA area delivery route from Alan Fisher, as Earl Keller, his defendant FBI handler posed as a fuel oil salesman. BREYER, defendant CIA/ARMY's handler was pre-positioned as Snow in the late 1960s and was the fraudulent Sunday home church elder where the Lead Plaintiff's family was abruptly reassigned, together with the reassignment to northeast Tacoma for Wednesday night services immediately

after Sandra's 1970 death. The family was then reassigned again around 1972 to another set of home churches.

775. Following defendants BREYER, CIA, ARMY, FBI, DOJ, and UNITED STATES (and unknown others), Summer 1974 oxytocin family destruction excursion (paragraph 415), Don sold his dairy products route, and was then illegally handled through Boyd's Coffee, which was followed by employment at Miller Cascade, the subsidiary or affiliate of SSA consolidated with PGR to form FSA, where federal agent Christensen was illegally embedded as a result of the PGR consolidation into FSA. Don then purchased and rehabilitated an abandoned poultry farm, which he later sold, then moved to a South Hill, WA home, where he semi-retired, returning to part-time working at Smith Brothers Dairy, Kent, WA, as a delivery route relief driver, before moving again in South Hill, WA, to the current home he shared with Lead Plaintiff's mother until his death.

776. At his death, Don was suffering from severe hearing loss and sight loss from macular degeneration, plausibly related to illegal human medical experiments on eyesight, which Lead Plaintiff has experienced through (i) lengthy periods of repeated torturous headache sessions in Boston, MA and Cliffside Park, NJ (paragraphs 602C NSEC-3, 605A-C HEXP-2) which effect different parts of the visual system and (ii) through flattened (non-stereoscopic) images directly placed by illegal BRMT bioweapon and bioweapon delivery system hacks upon either (a) his lateral geniculate nucleus (most plausibly only one of the two as the image was non-stereoscopic) the two visual processors between the eyes, or (b) on his visual cortex in the brain when the precursor 1549 image was placed in the weeks leading to the January 15, 2009 US Airways 1549 Hudson River emergency landing, as related at paragraphs 602Z, 606B. As he

was going blind and deaf, Don elected not to treat a pre-leukemia condition, which led to his death within about six weeks on October 4, 2015.

### D. Uncle Bruce's Employment Pattern

777. After his defendant ARMY service, Lead Plaintiff's uncle Bruce was employed by Walla Walla Federal Savings and Loan, which failed during the 1980s S&L crisis. Soon thereafter, unable to find other work, Lead Plaintiff's uncle Bruce became an independent real estate appraiser, then moved from Walla Walla, WA to Tri-Cities (Richland, Kennewick, Pasco, WA) in the mid-1980s. Tri-Cities was built around federal government operations at Hanford Nuclear Reservation, where weapons-grade uranium was produced during World War II.

Weapons grade plutonium production began in the 1950s. Hanford Nuclear Reservation operated until 1965-1987 as the nuclear reactors used in production of weapons-grade plutonium were successively shut down. The region hosted defendant FBI national security counterintelligence operations and agents.

778. Bruce was then hired by Banner Bank, Bothell, WA in the 1990s. This shadow bank, hidden under the name of the regional Banner Bank, was used by defendant UNITED STATES to launder the funds which subsidized loss leading cover operations of CNA Industrial Engineering, where Lead Plaintiff worked from 1996-2002. Defendant FAUCI frequently referenced Banner Bank Bothell in his discussions with Lead Plaintiff regarding the funding of CNA operations, most probably to backcheck operational security to determine if the unwitting Lead Plaintiff had made any connection with the parallel manipulation of the uncle Bruce who worked at Banner Bank Bothell. Bruce retired from Banner Bank Bothell back to Walla Walla, WA, his old college town and his wife's hometown, where his son Burt and his wife were raising Audrey, their oldest child, and other grandchildren, murdered at age 18 in an illegal BRMT

bioweapon and bioweapon delivery system assassination field test of tools of violence in September 2011, described at paragraphs 803, 805.

### E. Maternal Grandparents' Employment Pattern

779. Lead Plaintiff's grandfather Don Thompson was an Enumclaw dairy farmer in the 1950 who sought outside employment at Farmer's Union Central Exchange Cooperative (FUCE, now CENEX), Auburn, WA where he was promoted to Manager until ousted by the local coop Board, which plausibly was coopted by defendant FBI embedded agents, then became an independent trucker, then was plausibly trafficked by defendant FBI to manage CENEX coop location in Shelby, Cutbank, and Valier, MT, for about two years, most probably during national security investigations, then returned to Auburn, WA and employment at Mitchell Brothers, a hazardous material line haul trucking company, then retired.

780. The coopting of coops by defendant UNITED STATES with no plausible basis for their legal presence in these private sector operations, which defendant FBI has sometimes used to destroy other private enterprises and the cooperatives themselves, is a clear pattern of racketeering enterprise conduct, based upon Lead Plaintiff's own direct experience at PCC, Seattle, WA and its affiliate, NutraSource. Further, Lead Plaintiff's grandmother complained of the same form of episodically recurring plausibly BRMT induced intense headaches after retirement and return to Auburn, WA, as the Lead Plaintiff has experienced during documented torture episodes described at paragraphs 602C, 605A-C, indicative of the scope and duration of the extended family's experience with the illegal BRMT bioweapon and bioweapon delivery system, illegal human subject experimentation, extent and duration of human trafficking, the overall patterns of associated-in-fact enterprise racketeering acts and conspiracy, and the conspiracy against rights by these defendants.

F. Other Class Member Employment Patterns Subject to Discovery

781. Other extended family members and romantic partners have similar distinctive

employment patterns, but the scope and duration of those patterns is not well-known at the time

of the preparation of this complaint and are subject to discovery. These employment patterns are

representative of the associated-in-fact enterprise pattern of defendant UNITED STATES

departments and agencies, and their co-conspirator state and local government conspiracy and

complicity to support and sustain systematic violations of constitutional and the associated-in-

fact enterprise pattern of racketeering acts from at least 1961 to the present time, all in violations

of, without limitation, our Constitution, of constitutional, civil, and human rights, of 42 U.S.C.

Chapter 21 Civil Rights and 21B Religious Freedom Restoration Act, of 18 U.S.C. §§ 1961-1968

and the directly related associated-in-fact enterprise pattern of racketeering acts, violations, and

injuries against this class of plaintiffs.

782. Paragraphs 782 through 784 are reserved.

END OF FACTS.

[Intentionally left blank.]