CLAIMS FOR RELIEF

785. Acts, violations, and injuries to these plaintiffs are identified in accordance with the form and method of constitutional and statutory violations in this section. The legal authority for the specific remedies for these constitutional and statutory claims, and the legal forms that remedies can take are identified in paragraphs 899 through 916. Defendants have and do act, in their series of conspiracies and attempts to defraud, entrap, incriminate, discredit, disable, and/or destroy the Lead Plaintiff, as particularly cited and described in each subcount in the table at each paragraph 801 through 854, both within and without the territory of these states and of the United States. This long-running, comprehensive, and systematic pattern of associated-in-fact enterprise racketeering acts has and does sustain the fraudulent concealment of (i) the illegal BRMT bioweapon and bioweapon delivery system, of (iii) the associated-in-fact illegal enterprise itself, of (iii) continuing obstructions of justice both by acts and by willful blindness, and (iv) perpetuate the destruction of evidence of prior criminal acts, and of acts, injuries, and violations of constitutional, common law, and statutory Privileges and Immunities, by these defendants, all directed without legal cause under color of law at this specifically targeted class of plaintiffs.

786. In accordance with 18 U.S.C. § 1962(d), 28 U.S.C. 2679(b)(2), and, without limitation, 18 U.S.C. §§ 1961-1968, 42 U.S.C. §§ 1983, 1985, 1986, and the *First, Third, Fourth, Fifth, Eighth, Ninth, Thirteenth,* and *Fourteenth* Amendments to the Constitution. and relevant case law cited in paragraphs 250 through 345, all defendants share direct, vicarious, and joint and several liability for each and every claim for the acts, violations, and injuries cited in this complaint, which taken together characterize this durable associated-in-fact enterprise and conspiracy. Liability attaches to each and all of these defendants, whether named herein or not

yet known, as to all the acts, violations, and injuries herein, as they have and do engage and conspire to engage in one or more of the following:

(i) Direct commission of a substantive act, violation or injury of rights, whether or not under a specific statute;

(ii) Conspiracy to commit a substantive act, violation or injury – in accordance with *Pinkerton v. United States*, 328 U.S. 640 (1946), co-defendants in a conspiracy are liable for acts, violations, and injuries committed by their co-conspirators, when those co-conspirator violations are reasonably foreseeable and committed to further the conspiracy;

(iii) Aiding and abetting a substantive act, violation or injury - any form of concerted action(s) knowingly rendered to the principal perpetrator(s) as substantial assistance in the absence of an agreement, given when the aider and abettor has knowledge of the act, violation, or injury, whether rendered before, during, or after the act, violation, or injury, to these plaintiffs.

787. The acts and circumstances alleged in this complaint establish that defendants have and do both act and conspire with each other and with others to accomplish the objectives detailed in this complaint, including through the following agreements including, without limitation, through tacit and implicit agreements:

(i) To sustain acts and a pattern of acts, violations, and injuries which have and do continue to damage and injure the lives, business, business prospects, and the business and personal financial, real, and intangible property of the Lead Plaintiff and other plaintiffs, regardless of their attributed motive;

(ii) To sustain acts and a pattern of acts, violations, and injuries which have and do damage the business, business prospects, and the personal financial, real, and

intangible property of the Lead Plaintiff and other plaintiffs, so as to suppress or eliminate Lead Plaintiff's ability, and other plaintiffs' ability, to act to expose the defendants' prior and planned criminal actions and rights violations and those by other of the defendants;

(iii) To fraudulently conceal and explicitly prevent the Lead Plaintiff and other plaintiffs from learning the identities of the defendants who act under color of law in violation of their legal duties and responsibilities under the Constitution and laws of the United States, and the nations and states within which they operate so as to perpetuate the conspiracy.

788. The acts, facts, and circumstances alleged in this Complaint further demonstrate the commission of overt act(s) and injuries in furtherance of each such agreement, and each defendant's intentional participation in the furtherance of the agreement. The acts, facts, and circumstances alleged in this Complaint establish that defendants conspired with each other and others to accomplish the objectives and injuries detailed in this Complaint including, without limitation, through their agreements as detailed in the subcounts at paragraphs 600-710 herein.

789. As a result of each act committed, and in furtherance of the conspiracies identified, each plaintiff suffered and continues to suffer injuries to their person, personal, and commercial interests, including physical, emotional, financial, and property injuries, as described above, including, without limitation, in both in-state and interstate commerce.

790. Defendants, both known and unknown, acting under color of law are directly liable for the violations of federal and state statutes as specifically cited at each paragraph 801 through 854 while acting outside the scope of their agency, as will be established by facts, some of which can only be established through discovery, and proven at trial.

791. Discovery will provide further specific evidence relevant to each noted incident and more incidents of such acts, both of acts, violations, and injuries survived by the targeted plaintiffs and those likely not survived by members of this class of plaintiffs. These acts, violations, and injuries are representative of those perpetrated by these defendants on this class of plaintiffs.

792. All defendants are vicariously liable for the violations of violations of federal and state statutes as specifically cited at each paragraph 801 through 854, caused and created by their agents who acted within the scope of their agency in accordance or agreements with other defendants, to cause and create injury to the Lead Plaintiff and/or other members of this class of plaintiffs.

793. *All defendants:* Defendants' specific responsibilities for each of the 54 specific claims for relief herein are difficult for plaintiffs to establish except at trial due to the institutional and legal strictures which relate to undercover police powers operations and the clear and readily apparent willingness of various police powers agencies to violate even those extremely advantageous legal strictures. Assignment of specific liability and responsibility to entity and individual person defendants acting outside the law, and acting outside the scope of their agency in the case of those who are police powers officers and agents, is extremely difficult for these plaintiffs at this time given (i) the long-running pattern abuses of civil rights by these agencies (which are also well documented in the public record), (ii) by the systematic abuses by electronic means using both (a) ordinary electronic devices and (b) the illegal development and deployment of the BRMT bioweapon and bioweapon system under the deep cover of color of law abuse of the state secrets privilege against US persons, just as defendant CIA did for over twenty years in MKUltra. This pattern of racketeering acts is further complicated by the police powers and intelligence agency abuses of cover legends and identities across time among deep

cover police powers and intelligence officials who have acted within and without their scope of agency, and by their willful obstructions of justice including, without limitation, destruction of evidence before and as this complaint was prepared, witness tampering, retaliation, intimidation, and lethality threats and attempts during the forensic analysis period beginning in 2021 to unmask this unprosecuted criminal conspiracy under color of law.

794. *All governmental defendants:* The acts, facts, and circumstances alleged in this Complaint demonstrate the following:

(i) In the exercise or failure to exercise their duties under law, defendants know, knew, should know, or should have known, that (a) their actions and/or failures to act result in the violation of the human, Constitutional, and civil rights of the Lead Plaintiff and/or other plaintiffs; and/or (b) is so closely related to the deprivation of the plaintiffs' rights as to be the moving force that caused or causes the ultimate injury; and/or (c) would or will play a substantial part in bringing about or actually causing the injury or damage to the Lead Plaintiff and/or other plaintiffs.

(ii) Defendants at all governmental levels, both with and without intelligence, military, and police powers departments and agencies have and do act under color of law in their exercise or failure to exercise their duty to establish policy, govern, manage, supervise, lead, train, and protect the rights of the Lead Plaintiff and/or other plaintiffs while acting within and outside the scope of (a) their individual duties; and/or (b) their supervisory duties to properly direct their subordinate(s); and/or (c) pursuant to (ca) an expressly adopted official policy or (cb) a widespread or longstanding practice or custom of the defendant organization; and/or (d) while engaged in acting as a final policymaker, (da) had and/or have final policymaking authority, and (db) knew of and specifically made a deliberate choice to approve the

act or policy; and/or (e) the policies and training of the defendant organization were not adequate to prevent violations of law by its employees to handle the usual and recurring situations with which they must deal; and/or (f) the defendant organization was deliberately indifferent to (fa) the substantial risk that its policies were inadequate to prevent violations of law and injuries by its employees and (fb) the known or obvious consequences of its failure to train its employees adequately.

795. *Defendant UNITED STATES:* Defendant UNITED STATES, its departments, and its agencies, are the originating perpetrators of all injuries incurred by these plaintiffs and bear primary original responsibility for the associated-in-fact enterprise these defendants initiated and have perpetuated for over fifty-six years in usurpations of power not granted and authority never permitted to be authorized in these violations of our Constitution. All defendants are culpable and liable for the entire associated-in-fact enterprise under law, and no defendant is released from any liability for any claim as parties to this associated-in-fact enterprise.

796. *Individual defendants who are or were governmental employees:* Claims for relief incorporate, without limitation, constitutional rights claim(s) made against individual defendants who are or were federal government officials and/or employees during their commission or negligent supervision during commission of the illegal acts herein, and /or abused their possession of information resulting from that employment, and their relationships with co-conspirators, to commit and/or conspire to commit these acts, violations, and injuries. A government provided defense under 28 U.S.C. § 2679(c), is consistent with Congressional intent ONLY for actions brought under the Westfall Act 28 U.S.C. Chapter 171 – Tort Procedure §§ 2671-2680. NONE of these claims are brought under the Westfall Act 28 U.S.C. Chapter 171 – Tort Procedure §§ 2671-2680. These former government officials are NOT entitled to a government provided defense, as they are individual defendants who bear the direct and total

personal responsibility and liability for constitutional claims against them in accordance with Congressional intent under 28 U.S.C. § 2679(b)(2).

797. The acts, violations, and injuries which comprise this action (a) exceed the authority available to any government official or employee under our Constitution to sustain any defensible claim of "immunity" (paragraphs 255-306) and, (b) are clearly justiciable directly against this class of individual defendants as demonstrated by (i) Congressional intent at 28 U.S.C. 2679(b)(2) which authorizes:

> "civil action against an employee of the Government (A) which is brought for a violation of the Constitution of the United States, or (B) which is brought for a violation of a statute of the United States under which such action against an individual is otherwise authorized"

and by (ii) 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"

and by (iii) our Constitution which expresses the constitutional intent of our founders to protect our "unalienable rights" at the:

First, Third, Fourth, Fifth, Eighth, Ninth, Thirteenth, and *Fourteenth* Amendments,

which constitutional claims all arise herein throughout all the claims at paragraphs 801 through 854, so these current and/or former federal government officials and/or employees may not rely on defendant DOJ for their individual defense and must provide for their own defense in this civil action.

798. Constitutional rights claims are made against these defendants for their violations of the:

(i) *First Amendment right* to freedom of religion, as the originating cause of these acts, violations, and injuries was and is defendant UNITED STATES, DOD, ARMY, CIA, DOJ, and departments and agencies' discrimination against this class of plaintiffs in their free choice and exercise of religion, whether by their personal choice or that of a forebear,

(ii) *First Amendment right* to peaceably assemble with persons of their choice in the time, place, and manner of their choosing,

(iii) *Third Amendment right* to be free of intrusions into their homes, families, and lives by soldiers, except in the time and manner of their own choosing,

(iv) *Fourth Amendment rights* to be secure in their persons, papers, houses, and effects from government intrusions, searches, and seizures absent reasonable suspicion, probable cause, and the securing of a warrant for such intrusions, searches, and/or seizures,

(v) *Fifth Amendment rights* to quiet enjoyment of life, liberty, and property without undue intrusions or abuses under color of law by government acting for its own purposes when it has no constitutional and legally compelling governmental purpose,

(vi) *Eighth Amendment right* to be free of all cruel and unusual punishments at all times,

(vii) *Ninth Amendment rights* to privacy and quiet enjoyment of life, family, friends, property, and shared national resources,

(viii) *Thirteenth Amendment right* to be free at all times from involuntary servitude, unless duly convicted,

(ix) *Fourteenth Amendment right* to equal protection of the laws without regard to religion, personal and political beliefs, or practices.

Each and every claim for relief herein arises from a violation of the constitutional rights of plaintiffs by current or former government officials and employees, who further have vicarious liability for all claims through the conspiracy they have and do promulgate and perpetuate against these plaintiffs both severally and jointly with others. Each and all these claims at paragraphs 801 through 854 include acts, violations, and injuries perpetrated directly by and/or in conspiracy with other defendants, and are brought under federal statutes including, without limitation, the RICO Act, the KKK Act, and civil rights statutes, as well as state statutes, as cited in each claim. These constitutional rights claims are specifically applied to each and every one of the 54 claims for relief herein, and are specifically asserted and incorporated by reference in each paragraph 801-854, and throughout this complaint, by reference as follows:

Constitutional Rights Claims By Amendment	**1**	**3**	**4**	**5**	**8**	**9**	**13**	**14**
801 Bioweapons and Bioweapons Delivery Systems Prohibited	X	X	X	X	X	X	X	X
802 Terrorism - Violent Crimes in Aid of Racketeering Enterprises	X		X		X	X	X	X
803 Murder	X		X		X	X	X	X
804 Attempted Murder			X	X	X	X		X
805 Conspiracy To Murder	X		X		X	X	X	X
806 Manslaughter			X	X	X	X		X
807 Attempted Manslaughter	X		X		X	X	X	X
808 Kidnapping	X		X	X	X	X	X	X
809 Human Trafficking	X		X	X	X	X	X	X
810 Torture – Mental and Physical Abuse	X		X	X	X	X	X	X
811 Conspiracy to Torture	X		X	X	X	X	X	X
812 Assault	X		X		X	X	X	X
813 Aggravated Battery	X		X		X	X	X	X
814 Soliciting Crime Of Violence	X		X		X	X	X	X
815 Interference With Interstate Commerce By Threats Or Violence	X		X	X	X	X	X	X
816 Tampering With Witness	X	X	X		X	X	X	X
817 Tampering With Witness - Evidence	X		X			X		X
818 Retaliating Against Witness	X	X	X		X	X	X	X
819 Tampering With Consumer Products	X		X		X	X	X	X
820 Involuntary Servitude	X	X	X	X	X	X	X	X
821 Peonage	X		X	X	X	X	X	X
822 Forced Labor	X		X	X	X	X	X	X

823 Sexual Abuse	X	X	X	X	X	X	X	X
824 Frauds - Mail	X		X		X	X	X	X
825 Frauds – Wire	X		X		X	X	X	X
826 Frauds - Computer Access Devices	X					X	X	X
827 Fraud And Related Activity - Computers	X		X	X		X	X	X
828 Attempts And Conspiracy - Frauds By Mail, Wire, Computer	X		X	X		X	X	X
829 Scheme To Defraud of Honest Services - Mail, Wire, Computer	X		X	X		X	X	X
830 Property Rights and Illegal Takings	X	X	X	X	X	X	X	X
831 Racketeering - Monetary Benefit From Unlawful Activity	X		X	X		X	X	X
832 Interstate And Foreign Travel Or Transportation For Racketeering Purposes	X		X	X		X	X	X
833. Civil Rights - Free Exercise Of Religion	X			X	X	X	X	X
834 Posse Comitatus - Use Of Military To Violate Constitutional Rights	X	X	X	X		X	X	X
835 Involuntary Servitude	X		X	X	X	X	X	X
836 Intentional Discrimination in Employment	X	X	X	X	X	X	X	X
837 Peonage	X		X	X	X	X	X	X
838 Conspiracy Against Rights	X	X	X	X		X	X	X
839 Deprivation of Rights	X	X	X	X		X	X	X
840 Deprivation of Rights Under Color of Law	X	X	X	X		X	X	X
841 Civil Rights - Deprivation of Rights Under Color of Law, Anti-Terrorist Forfeiture Protection	X	X	X	X		X	X	X
842 Deprivation of Rights Under Color of Law - Searches and Warrants	X	X	X	X		X	X	X
843 Searches Exceed Authority, Malicious Procurement, Without Warrant.	X		X	X		X	X	X
844 False Information and Hoaxes	X		X			X	X	X
845 Neglect To Protect - Failure To Protect	X	X	X	X	X	X	X	X
846 Neglect To Protect - Failure To Supervise	X	X	X	X	X	X	X	X
847 Neglect To Protect - Failure To Train	X	X	X	X	X	X	X	X
848 Neglect To Protect - Misprison of Felony	X	X	X	X	X	X	X	X
849 Neglect To Protect - Acting as Accomplice	X	X	X	X	X	X	X	X
850 Neglect To Protect - Acting as Accessory	X	X	X	X	X	X	X	X
851 Neglect To Protect - Aiding and Abetting	X	X	X	X	X	X	X	X
852 Prohibited Activities - Pattern Of Racketeering Acts	X	X	X	X	X	X	X	X
853 Defamation	X		X	X	X	X	X	X
854 Freedom Of Information	X					X	X	

799. Defendant UNITED STATES is directly and specifically liable as to all claims herein and has co-opted and/or conspired with private companies and organizations to perpetrate

illegal and unconstitutional acts against "unalienable" constitutional rights, economic rights, and political rights in its sabotage and damaging of those entities and organizations, and against the Lead Plaintiff and other plaintiffs, as evidenced by both the direct experience of the Lead Plaintiff throughout this Complaint, and by the Congressional record at LPEE pages 237-367, 6885-7466. All defendants are culpable and liable as direct perpetrators and/or co-conspirators for all claims herein including those made under, without limitation, 28 U.S.C. 2679(b)(2), 18 U.S.C. §§ 1961-1968, 42 U.S.C. §§ 1983, 1985, 1986, and the *First, Third, Fourth, Fifth, Eighth, Ninth, Thirteenth*, and *Fourteenth* Amendments to the Constitution. For efficiency in presentation, each defendant is identified in the table below by the paragraph number in paragraphs 120 through 227 where they are identified as a party to this litigation, and are hereby named as defendants to each related count at paragraphs 801 through 854 as follows:

[Intentionally left blank.]

Defendant Named at Paragraph Number	**119**	**120**	**121**	**122**	**123**	**124**	**125**
Defendant Common Name	US	CIA	FBI	DOJ	USMS	DNI	DOD
Claims - Constitutional Rights, Statutory, and Common Law							
801 Bioweapons and Bioweapons Delivery Systems Prohibited	X	X	X	X	X	X	X
802 Terrorism - Violent Crimes In Aid Of Racketeering Enterprises	X	X	X	X	X		X
803 Murder	X	X	X	X	X		X
804 Attempted Murder	X	X	X	X	X		X
805 Conspiracy To Murder	X	X	X	X	X		X
806 Manslaughter	X	X	X	X	X		X
807 Attempted Manslaughter	X	X	X	X	X		X
808 Kidnapping	X	X	X	X	X		
809 Human Trafficking	X	X	X	X	X		X
810 Torture – Mental and Physical Abuse	X	X	X	X	X		X
811 Conspiracy to Torture	X	X	X	X	X		X
812 Assault	X	X	X	X	X		X
813 Aggravated Battery	X	X	X	X	X		X
814 Soliciting Crime Of Violence	X	X	X	X	X		X
815 Interference With Interstate Commerce By Threats Or Violence	X	X	X	X	X		X
816 Tampering With Witness	X	X	X	X	X		X
817 Tampering With Witness - Evidence	X	X	X	X	X		X
818 Retaliating Against Witness	X	X	X	X	X		X
819 Tampering With Consumer Products	X	X	X	X	X		X
820 Involuntary Servitude	X	X	X	X	X		X
821 Peonage	X	X	X	X	X		X
822 Forced Labor	X	X	X	X	X		X
823 Sexual Abuse	X	X	X	X	X		X
824 Frauds - Mail	X	X	X	X	X		X
825 Frauds – Wire	X	X	X	X	X		X
826 Frauds - Computer Access Devices	X	X	X	X	X		X
827 Fraud And Related Activity - Computers	X	X	X	X	X		X

Defendant Named at Paragraph Number	**119**	**120**	**121**	**122**	**123**	**124**	**125**
Defendant Common Name	US	CIA	FBI	DOJ	USMS	DNI	DOD
Claims - Constitutional Rights, Statutory, and Common Law							
828 Attempts And Conspiracy - Frauds By Mail, Wire, Computer	X	X	X	X	X		X
829 Scheme To Defraud of Honest Services - Mail, Wire, Computer	X	X	X	X	X		X
830 Property Rights and Illegal Takings	X	X	X	X	X		X
831 Racketeering - Monetary Benefit	X	X	X	X	X		X
832 Interstate And Foreign Travel Or Transportation For Racketeering Purposes	X	X	X	X	X		X
833 Civil Rights - Free Exercise Of Religion	X	X	X	X	X	X	X
834 Posse Comitatus - Use Of Military	X	X	X	X	X	X	X
835 Involuntary Servitude	X	X	X	X	X	X	X
836 Intentional Discrimination in Employment	X	X	X	X	X		X
837 Peonage	X	X	X	X	X		X
838 Conspiracy Against Rights	X	X	X	X	X	X	X
839 Deprivation of Rights	X	X	X	X	X	X	X
840 Deprivation of Rights Under Color of Law	X	X	X	X	X	X	X
841 Civil Rights - Deprivation of Rights Under Color of Law, Anti-Terrorist Forfeiture Protection	X	X	X	X	X	X	X
842 Deprivation of Rights Under Color of Law - Searches and Warrants	X	X	X	X	X	X	X
843 Searches Exceed Authority, Malicious Procurement, Without Warrant	X	X	X	X	X		X
844 False Information and Hoaxes	X	X	X	X	X		X
845 Neglect To Protect - Failure To Protect	X	X	X	X	X	X	X
846 Neglect To Protect - Failure To Supervise	X	X	X	X	X	X	X
847 Neglect To Protect - Failure To Train	X	X	X	X	X	X	X
848 Neglect To Protect - Misprison of Felony	X	X	X	X	X	X	X
849 Neglect To Protect - Acting as Accomplice	X	X	X	X	X	X	X
850 Neglect To Protect - Acting as Accessory	X	X	X	X	X	X	X
851 Neglect To Protect - Aiding and Abetting	X	X	X	X	X	X	X
852 Prohibited Activities - Pattern Of Racketeering Acts	X	X	X	X	X	X	X
853 Defamation	X	X	X	X	X		
854 Freedom Of Information	X	X	X	X	X	X	X

Defendant Named at Paragraph Number	126	127	128	129	130	131	132
Defendant Common Name	ARMY	DARPA	DHS	USSS	DHHS	NIAID	NATARCHIV
Claims - Constitutional Rights, Statutory, and Common Law							
801 Bioweapons and Bioweapons Delivery Systems Prohibited	X	X	X	X	X	X	
802 Terrorism - Violent Crimes In Aid Of Racketeering Enterprises	X	X	X	X	X	X	
803 Murder	X				X	X	
804 Attempted Murder	X		X	X	X	X	
805 Conspiracy To Murder	X		X	X	X	X	
806 Manslaughter	X		X	X	X	X	
807 Attempted Manslaughter	X		X	X	X	X	
808 Kidnapping			X	X	X	X	
809 Human Trafficking	X	X	X	X	X	X	
810 Torture – Mental and Physical Abuse	X	X	X	X	X	X	
811 Conspiracy to Torture	X	X	X	X	X	X	
812 Assault	X	X	X	X	X	X	
813 Aggravated Battery	X	X	X	X	X	X	
814 Soliciting Crime Of Violence	X		X	X	X	X	
815 Interference With Interstate Commerce By Threats Or Violence	X		X	X	X	X	
816 Tampering With Witness	X		X	X	X	X	
817 Tampering With Witness - Evidence	X		X	X	X	X	
818 Retaliating Against Witness	X		X	X	X	X	
819 Tampering With Consumer Products	X				X	X	
820 Involuntary Servitude	X	X	X	X	X	X	
821 Peonage	X	X	X	X	X	X	
822 Forced Labor	X	X	X	X	X	X	
823 Sexual Abuse	X	X	X	X	X	X	
824 Frauds - Mail	X		X	X	X	X	
825 Frauds – Wire	X		X	X	X	X	
826 Frauds - Computer Access Devices	X		X	X	X	X	
827 Fraud And Related Activity - Computers	X	X	X	X	X	X	

Defendant Named at Paragraph Number	126	127	128	129	130	131	132
Defendant Common Name	ARMY	DARPA	DHS	USSS	DHHS	NIAID	NATARCHIV
Claims - Constitutional Rights, Statutory, and Common Law							
828 Attempts And Conspiracy - Frauds By Mail, Wire, Computer	X	X	X	X	X	X	
829 Scheme To Defraud of Honest Services - Mail, Wire, Computer	X		X	X	X	X	
830 Property Rights and Illegal Takings	X	X			X	X	
831 Racketeering - Monetary Benefit	X	X			X	X	
832 Interstate And Foreign Travel Or Transportation For Racketeering Purposes	X		X	X	X	X	
833 Civil Rights - Free Exercise Of Religion	X	X	X		X	X	
834 Posse Comitatus - Use Of Military	X	X	X				
835 Involuntary Servitude	X	X	X	X	X	X	
836 Intentional Discrimination in Employment	X	X	X	X	X	X	
837 Peonage	X	X	X	X	X	X	
838 Conspiracy Against Rights	X	X	X	X	X	X	
839 Deprivation of Rights	X	X	X	X	X	X	
840 Deprivation of Rights Under Color of Law	X	X	X	X	X	X	
841 Civil Rights - Deprivation of Rights Under Color of Law, Anti-Terrorist Forfeiture Protection	X	X	X	X	X	X	
842 Deprivation of Rights Under Color of Law - Searches and Warrants	X		X	X	X	X	
843 Searches Exceed Authority, Malicious Procurement, Without Warrant	X		X	X	X	X	
844 False Information and Hoaxes	X	X	X	X		X	
845 Neglect To Protect - Failure To Protect	X	X	X	X	X	X	
846 Neglect To Protect - Failure To Supervise	X	X	X	X	X	X	
847 Neglect To Protect - Failure To Train	X	X	X	X	X	X	
848 Neglect To Protect - Misprison of Felony	X	X	X	X	X	X	
849 Neglect To Protect - Acting as Accomplice	X	X	X	X	X	X	
850 Neglect To Protect - Acting as Accessory	X	X	X	X	X	X	
851 Neglect To Protect - Aiding and Abetting	X	X	X	X	X	X	
852 Prohibited Activities - Pattern Of Racketeering Acts	X	X	X	X	X	X	
853 Defamation			X	X	X	X	
854 Freedom Of Information	X	X	X	X	X	X	X

Defendant Named at Paragraph Number	133	136	137	138	139	140	141
Defendant Common Name	UNK FED	FWS D	KCS D	WAS H	WSU	NYC	NYP D
Claims - Constitutional Rights, Statutory, and Common Law							
801 Bioweapons and Bioweapons Delivery Systems Prohibited	X	X	X	X	X		
802 Terrorism - Violent Crimes In Aid Of Racketeering Enterprises	X						
803 Murder	X		X				
804 Attempted Murder	X		X				
805 Conspiracy To Murder	X		X				
806 Manslaughter	X		X				
807 Attempted Manslaughter	X		X				
808 Kidnapping	X		X				
809 Human Trafficking	X	X	X	X	X		
810 Torture – Mental and Physical Abuse	X		X				
811 Conspiracy to Torture	X		X				
812 Assault	X	X	X	X	X	X	X
813 Aggravated Battery	X	X	X	X	X	X	X
814 Soliciting Crime Of Violence	X		X				X
815 Interference With Interstate Commerce By Threats Or Violence	X		X				X
816 Tampering With Witness	X						X
817 Tampering With Witness - Evidence	X						X
818 Retaliating Against Witness	X						X
819 Tampering With Consumer Products	X						
820 Involuntary Servitude	X		X	X	X		X
821 Peonage	X	X	X	X	X		X
822 Forced Labor	X	X	X	X	X		X
823 Sexual Abuse	X		X	X	X	X	X
824 Frauds - Mail	X	X	X	X	X	X	X
825 Frauds – Wire	X	X	X	X	X	X	X
826 Frauds - Computer Access Devices	X		X	X	X	X	X
827 Fraud And Related Activity - Computers	X		X	X	X	X	X

Defendant Named at Paragraph Number	133	136	137	138	139	140	141
Defendant Common Name	UNK FED	FWS D	KCS D	WAS H	WSU	NYC	NYP D
Claims - Constitutional Rights, Statutory, and Common Law							
828 Attempts And Conspiracy - Frauds By Mail, Wire, Computer	X	X	X	X	X	X	X
829 Scheme To Defraud of Honest Services - Mail, Wire, Computer	X		X	X	X	X	X
830 Property Rights and Illegal Takings	X		X	X			X
831 Racketeering - Monetary Benefit	X						
832 Interstate And Foreign Travel Or Transportation For Racketeering Purposes	X				X		X
833 Civil Rights - Free Exercise Of Religion	X	X	X	X	X		
834 Posse Comitatus - Use Of Military	X	X	X	X	X		
835 Involuntary Servitude	X		X	X	X		X
836 Intentional Discrimination in Employment	X		X		X		X
837 Peonage	X	X	X	X	X		X
838 Conspiracy Against Rights	X	X	X	X	X	X	X
839 Deprivation of Rights	X	X	X	X	X	X	X
840 Deprivation of Rights Under Color of Law	X	X	X	X	X	X	X
841 Civil Rights - Deprivation of Rights Under Color of Law, Anti-Terrorist Forfeiture Protection	X		X	X	X	X	X
842 Deprivation of Rights Under Color of Law - Searches and Warrants	X	X	X	X	X		X
843 Searches Exceed Authority, Malicious Procurement, Without Warrant	X	X	X	X	X		X
844 False Information and Hoaxes	X						X
845 Neglect To Protect - Failure To Protect	X	X	X	X	X	X	X
846 Neglect To Protect - Failure To Supervise	X	X	X	X	X	X	X
847 Neglect To Protect - Failure To Train	X	X	X	X	X	X	X
848 Neglect To Protect - Misprison of Felony	X	X	X	X	X	X	X
849 Neglect To Protect - Acting as Accomplice	X	X	X	X	X	X	X
850 Neglect To Protect - Acting as Accessory	X	X	X	X	X	X	X
851 Neglect To Protect - Aiding and Abetting	X	X	X	X	X	X	X
852 Prohibited Activities - Pattern Of Racketeering Acts	X	X	X	X	X	X	X
853 Defamation	X					X	X
854 Freedom Of Information	X					X	X

Defendant Named at Paragraph Number	142	143	144	145	146	147	148
Defendant Common Name	NJSP	PAPD	NJTPD	BERGEN SHERIFF	BERGEN COUNTY	MARICOPA COUNTY	MARICOPA SHERIFF
Claims - Constitutional Rights, Statutory, and Common Law							
801 Bioweapons and Bioweapons Delivery Systems Prohibited							
802 Terrorism - Violent Crimes In Aid Of Racketeering Enterprises							
803 Murder							
804 Attempted Murder							
805 Conspiracy To Murder							
806 Manslaughter							
807 Attempted Manslaughter							
808 Kidnapping	X	X	X	X	X		
809 Human Trafficking						X	X
810 Torture – Mental and Physical Abuse							
811 Conspiracy to Torture							
812 Assault							
813 Aggravated Battery							
814 Soliciting Crime Of Violence							
815 Interference With Interstate Commerce By Threats Or Violence	X	X	X				
816 Tampering With Witness	X	X	X	X	X		
817 Tampering With Witness - Evidence							
818 Retaliating Against Witness	X	X	X	X	X		
819 Tampering With Consumer Products							
820 Involuntary Servitude	X	X	X	X	X	X	X
821 Peonage	X	X	X	X	X	X	X
822 Forced Labor	X	X	X	X	X	X	X
823 Sexual Abuse	X	X	X				
824 Frauds - Mail							
825 Frauds – Wire	X	X	X	X	X	X	X
826 Frauds - Computer Access Devices							
827 Fraud And Related Activity - Computers	X	X	X	X	X	X	X

Defendant Named at Paragraph Number	142	143	144	145	146	147	148
Defendant Common Name	NJSP	PAPD	NJTPD	BERGEN SHERIFF	BERGEN COUNTY	MARICOPA COUNTY	MARICOPA SHERIFF
Claims - Constitutional Rights, Statutory, and Common Law							
828 Attempts And Conspiracy - Frauds By Mail, Wire, Computer	X	X	X	X	X	X	X
829 Scheme To Defraud of Honest Services - Mail, Wire, Computer							X
830 Property Rights and Illegal Takings	X	X	X	X	X	X	X
831 Racketeering - Monetary Benefit							
832 Interstate And Foreign Travel Or Transportation For Racketeering Purposes		X	X				X
833 Civil Rights - Free Exercise Of Religion							
834 Posse Comitatus - Use Of Military							
835 Involuntary Servitude	X	X	X	X	X	X	X
836 Intentional Discrimination in Employment	X	X	X	X	X	X	X
837 Peonage	X	X	X	X	X	X	X
838 Conspiracy Against Rights	X	X	X	X	X	X	X
839 Deprivation of Rights	X	X	X	X	X	X	X
840 Deprivation of Rights Under Color of Law	X	X	X	X	X	X	X
841 Civil Rights - Deprivation of Rights Under Color of Law, Anti-Terrorist Forfeiture Protection	X	X	X	X	X	X	X
842 Deprivation of Rights Under Color of Law - Searches and Warrants	X	X	X	X	X	X	X
843 Searches Exceed Authority, Malicious Procurement, Without Warrant	X	X	X	X	X	X	X
844 False Information and Hoaxes	X	X	X	X	X	X	X
845 Neglect To Protect - Failure To Protect	X	X	X	X	X	X	X
846 Neglect To Protect - Failure To Supervise	X	X	X	X	X	X	X
847 Neglect To Protect - Failure To Train	X	X	X	X	X	X	X
848 Neglect To Protect - Misprison of Felony	X	X	X	X	X	X	X
849 Neglect To Protect - Acting as Accomplice	X	X	X	X	X	X	X
850 Neglect To Protect - Acting as Accessory	X	X	X	X	X	X	X
851 Neglect To Protect - Aiding and Abetting	X	X	X	X	X	X	X
852 Prohibited Activities - Pattern Of Racketeering Acts	X	X	X	X	X	X	X
853 Defamation	X	X	X	X	X	X	X
854 Freedom Of Information							

Defendant Named at Paragraph Number	149	150	160	161	162	163	164
Defendant Common Name	COVER COMPANIES	JDOE POLICE POWERS	ACME MARKETS	WALMART CHINA	WALMART	COSTCO	KROGER
Claims - Constitutional Rights, Statutory, and Common Law							
801 Bioweapons and Bioweapons Delivery Systems Prohibited							
802 Terrorism - Violent Crimes In Aid Of Racketeering Enterprises							
803 Murder							
804 Attempted Murder							
805 Conspiracy To Murder							
806 Manslaughter							
807 Attempted Manslaughter							
808 Kidnapping							
809 Human Trafficking	X	X					
810 Torture – Mental and Physical Abuse							
811 Conspiracy to Torture							
812 Assault							
813 Aggravated Battery							
814 Soliciting Crime Of Violence							
815 Interference With Interstate Commerce By Threats Or Violence							
816 Tampering With Witness	X	X					
817 Tampering With Witness - Evidence	X	X					
818 Retaliating Against Witness	X	X					
819 Tampering With Consumer Products			X				
820 Involuntary Servitude	X	X		X	X	X	X
821 Peonage	X	X		X	X	X	X
822 Forced Labor	X	X		X	X	X	X
823 Sexual Abuse							
824 Frauds - Mail							
825 Frauds – Wire	X	X		X	X	X	X
826 Frauds - Computer Access Devices			X	X	X	X	X
827 Fraud And Related Activity - Computers	X	X					

Defendant Named at Paragraph Number	149	150	160	161	162	163	164
Defendant Common Name	COVER COMPANIES	JDOE POLICE POW	ACME MARKETS	WALMART CHINA	WALMART	COSTCO	KROGER
Claims - Constitutional Rights, Statutory, and Common Law							
828 Attempts And Conspiracy - Frauds By Mail, Wire, Computer	X	X		X	X	X	X
829 Scheme To Defraud of Honest Services - Mail, Wire, Computer	X	X					
830 Property Rights and Illegal Takings	X	X		X	X	X	X
831 Racketeering - Monetary Benefit	X	X					
832 Interstate And Foreign Travel Or Transportation For Racketeering Purposes							
833 Civil Rights - Free Exercise Of Religion							
834 Posse Comitatus - Use Of Military							
835 Involuntary Servitude	X	X		X	X	X	X
836 Intentional Discrimination in Employment	X	X					
837 Peonage	X	X		X	X	X	X
838 Conspiracy Against Rights	X	X		X	X	X	X
839 Deprivation of Rights	X	X		X	X	X	X
840 Deprivation of Rights Under Color of Law	X	X					
841 Civil Rights - Deprivation of Rights Under Color of Law, Anti-Terrorist Forfeiture Protection	X	X					
842 Deprivation of Rights Under Color of Law - Searches and Warrants	X	X					
843 Searches Exceed Authority, Malicious Procurement, Without Warrant	X	X					
844 False Information and Hoaxes	X	X		X	X	X	X
845 Neglect To Protect - Failure To Protect	X	X					
846 Neglect To Protect - Failure To Supervise	X	X					
847 Neglect To Protect - Failure To Train	X	X					
848 Neglect To Protect - Misprison of Felony	X	X					
849 Neglect To Protect - Acting as Accomplice	X	X					
850 Neglect To Protect - Acting as Accessory	X	X					
851 Neglect To Protect - Aiding and Abetting	X	X					
852 Prohibited Activities - Pattern Of Racketeering Acts	X	X		X	X	X	X
853 Defamation	X	X					
854 Freedom Of Information							

Defendant Named at Paragraph Number	165	166	167	168	169	170	171
Defendant Common Name	PPG	ESTABLISH	INSIGHT NETWORK	TECH SALES LEADS	LOEB & LOEB	WEINER	SULLIVAN
Claims - Constitutional Rights, Statutory, and Common Law							
801 Bioweapons and Bioweapons Delivery Systems Prohibited		X					
802 Terrorism - Violent Crimes In Aid Of Racketeering Enterprises							
803 Murder							
804 Attempted Murder							
805 Conspiracy To Murder							
806 Manslaughter							
807 Attempted Manslaughter							
808 Kidnapping							
809 Human Trafficking		X		X			
810 Torture – Mental and Physical Abuse							
811 Conspiracy to Torture		X					
812 Assault							
813 Aggravated Battery							
814 Soliciting Crime Of Violence							
815 Interference With Interstate Commerce By Threats Or Violence							
816 Tampering With Witness							
817 Tampering With Witness - Evidence							
818 Retaliating Against Witness							
819 Tampering With Consumer Products							
820 Involuntary Servitude	X	X		X	X	X	X
821 Peonage	X	X		X	X	X	X
822 Forced Labor	X	X		X	X	X	X
823 Sexual Abuse		X					
824 Frauds - Mail							
825 Frauds – Wire	X	X	X	X	X	X	X
826 Frauds - Computer Access Devices	X						
827 Fraud And Related Activity - Computers		X	X	X	X	X	X

Defendant Named at Paragraph Number	165	166	167	168	169	170	171
Defendant Common Name	PPG	ESTABLISH	INSIGHT NETWORK	TECH SALES LEADS	LOEB & LOEB	WEINER	SULLIVAN
Claims - Constitutional Rights, Statutory, and Common Law							
828 Attempts And Conspiracy - Frauds By Mail, Wire, Computer	X	X	X	X	X	X	X
829 Scheme To Defraud of Honest Services - Mail, Wire, Computer			X	X	X	X	X
830 Property Rights and Illegal Takings	X	X	X	X	X	X	X
831 Racketeering - Monetary Benefit		X	X	X	X	X	X
832 Interstate And Foreign Travel Or Transportation For Racketeering Purposes		X		X	X	X	X
833 Civil Rights - Free Exercise Of Religion							
834 Posse Comitatus - Use Of Military		X					
835 Involuntary Servitude	X	X	X	X	X	X	X
836 Intentional Discrimination in Employment		X					
837 Peonage	X	X	X	X	X	X	X
838 Conspiracy Against Rights	X	X	X	X	X	X	X
839 Deprivation of Rights	X	X	X	X	X	X	X
840 Deprivation of Rights Under Color of Law		X					X
841 Civil Rights - Deprivation of Rights Under Color of Law, Anti-Terrorist Forfeiture Protection		X					X
842 Deprivation of Rights Under Color of Law - Searches and Warrants							X
843 Searches Exceed Authority, Malicious Procurement, Without Warrant							X
844 False Information and Hoaxes	X	X					
845 Neglect To Protect - Failure To Protect		X	X	X			X
846 Neglect To Protect - Failure To Supervise		X	X	X			X
847 Neglect To Protect - Failure To Train		X	X	X			X
848 Neglect To Protect - Misprison of Felony		X	X	X			X
849 Neglect To Protect - Acting as Accomplice		X	X	X			X
850 Neglect To Protect - Acting as Accessory		X	X	X			X
851 Neglect To Protect - Aiding and Abetting		X	X	X			X
852 Prohibited Activities - Pattern Of Racketeering Acts	X	X	X	X			X
853 Defamation		X					
854 Freedom Of Information							

Defendant Named at Paragraph Number	172	173	174	175	176	177	178
Defendant Common Name	TRADEKEY.COM	WEBLINK.IN	PATEL	SCIARRA	ASTUDILLO	MATCHGROUP	BUMBLE
Claims - Constitutional Rights, Statutory, and Common Law							
801 Bioweapons and Bioweapons Delivery Systems Prohibited			X	X	X		
802 Terrorism - Violent Crimes In Aid Of Racketeering Enterprises				X			
803 Murder							
804 Attempted Murder				X			
805 Conspiracy To Murder							
806 Manslaughter							
807 Attempted Manslaughter				X			
808 Kidnapping							
809 Human Trafficking			X	X	X		
810 Torture – Mental and Physical Abuse			X	X			
811 Conspiracy to Torture			X	X	X		
812 Assault							
813 Aggravated Battery							
814 Soliciting Crime Of Violence							
815 Interference With Interstate Commerce By Threats Or Violence							
816 Tampering With Witness			X	X	X		
817 Tampering With Witness - Evidence							
818 Retaliating Against Witness			X	X	X		
819 Tampering With Consumer Products							
820 Involuntary Servitude			X	X	X		
821 Peonage			X	X	X		
822 Forced Labor			X	X	X		
823 Sexual Abuse							
824 Frauds - Mail							
825 Frauds – Wire	X	X	X	X	X	X	X
826 Frauds - Computer Access Devices							
827 Fraud And Related Activity - Computers	X	X				X	X

Defendant Named at Paragraph Number	172	173	174	175	176	177	178
Defendant Common Name	TRADEKEY.COM	WEBLINK.IN	PATEL	SCIARRA	ASTUDILLO	MATCHGROUP	BUMBLE
Claims - Constitutional Rights, Statutory, and Common Law							
828 Attempts And Conspiracy - Frauds By Mail, Wire, Computer	X	X	X	X	X	X	X
829 Scheme To Defraud of Honest Services - Mail, Wire, Computer	X	X	X	X	X	X	X
830 Property Rights and Illegal Takings	X	X				X	X
831 Racketeering - Monetary Benefit	X	X	X	X	X		
832 Interstate And Foreign Travel Or Transportation For Racketeering Purposes	X	X				X	X
833 Civil Rights - Free Exercise Of Religion							
834 Posse Comitatus - Use Of Military							
835 Involuntary Servitude	X	X	X	X	X	X	X
836 Intentional Discrimination in Employment							
837 Peonage	X	X	X	X	X	X	X
838 Conspiracy Against Rights	X	X	X	X	X	X	X
839 Deprivation of Rights	X	X	X	X	X	X	X
840 Deprivation of Rights Under Color of Law			X	X	X	X	X
841 Civil Rights - Deprivation of Rights Under Color of Law, Anti-Terrorist Forfeiture Protection						X	X
842 Deprivation of Rights Under Color of Law - Searches and Warrants			X	X	X	X	X
843 Searches Exceed Authority, Malicious Procurement, Without Warrant			X	X	X	X	X
844 False Information and Hoaxes						X	X
845 Neglect To Protect - Failure To Protect	X	X	X	X	X	X	X
846 Neglect To Protect - Failure To Supervise	X	X	X	X	X	X	X
847 Neglect To Protect - Failure To Train	X	X	X	X	X	X	X
848 Neglect To Protect - Misprison of Felony	X	X	X	X	X	X	X
849 Neglect To Protect - Acting as Accomplice	X	X	X	X	X	X	X
850 Neglect To Protect - Acting as Accessory	X	X	X	X	X	X	X
851 Neglect To Protect - Aiding and Abetting	X	X	X	X	X	X	X
852 Prohibited Activities - Pattern Of Racketeering Acts	X	X	X	X	X	X	X
853 Defamation						X	
854 Freedom Of Information							

Defendant Named at Paragraph Number	179	211	212	213	213A	214	215
Defendant Common Name	JDOE COMPANIES	BREYER	WEISSMAN	ROSENBERG	REICHERT	BURNS	STONE
Claims - Constitutional Rights, Statutory, and Common Law							
801 Bioweapons and Bioweapons Delivery Systems Prohibited	X	X	X	X	X	X	X
802 Terrorism - Violent Crimes In Aid Of Racketeering Enterprises	X	X	X	X		X	
803 Murder		X	X	X	X	X	
804 Attempted Murder	X	X	X	X	X	X	
805 Conspiracy To Murder		X	X	X	X	X	
806 Manslaughter		X	X	X	X	X	
807 Attempted Manslaughter	X	X	X	X	X	X	
808 Kidnapping		X	X	X	X	X	
809 Human Trafficking	X	X	X	X	X	X	X
810 Torture – Mental and Physical Abuse	X	X	X	X	X	X	
811 Conspiracy to Torture	X	X	X	X	X	X	
812 Assault		X	X	X	X	X	
813 Aggravated Battery		X	X	X	X	X	
814 Soliciting Crime Of Violence					X		
815 Interference With Interstate Commerce By Threats Or Violence		X	X	X	X	X	
816 Tampering With Witness	X						
817 Tampering With Witness - Evidence							
818 Retaliating Against Witness	X						
819 Tampering With Consumer Products							
820 Involuntary Servitude	X	X	X	X	X	X	X
821 Peonage	X	X	X	X	X	X	X
822 Forced Labor	X	X	X	X	X	X	X
823 Sexual Abuse		X	X	X	X	X	X
824 Frauds - Mail		X	X	X	X	X	X
825 Frauds – Wire	X	X	X	X	X	X	X
826 Frauds - Computer Access Devices		X	X	X	X	X	X
827 Fraud And Related Activity - Computers	X	X	X	X	X	X	X

Defendant Named at Paragraph Number	179	211	212	213	213A	214	215
Defendant Common Name	JDOE COMPANIES	BREYER	WEISSMAN	ROSENBERG	REICHERT	BURNS	STONE
Claims - Constitutional Rights, Statutory, and Common Law							
828 Attempts And Conspiracy - Frauds By Mail, Wire, Computer	X	X	X	X	X	X	X
829 Scheme To Defraud of Honest Services - Mail, Wire, Computer	X	X	X	X	X	X	X
830 Property Rights and Illegal Takings	X	X	X	X	X	X	X
831 Racketeering - Monetary Benefit	X		X	X			
832 Interstate And Foreign Travel Or Transportation For Racketeering Purposes	X	X	X	X		X	
833 Civil Rights - Free Exercise Of Religion		X	X	X	X	X	
834 Posse Comitatus - Use Of Military		X	X	X	X	X	X
835 Involuntary Servitude	X	X	X	X	X	X	X
836 Intentional Discrimination in Employment	X	X	X	X	X	X	X
837 Peonage	X	X	X	X	X	X	X
838 Conspiracy Against Rights	X	X	X	X	X	X	X
839 Deprivation of Rights	X	X	X	X	X	X	X
840 Deprivation of Rights Under Color of Law	X	X	X	X	X	X	X
841 Civil Rights - Deprivation of Rights Under Color of Law, Anti-Terrorist Forfeiture Protection	X	X	X	X	X	X	X
842 Deprivation of Rights Under Color of Law - Searches and Warrants	X	X	X	X	X	X	X
843 Searches Exceed Authority, Malicious Procurement, Without Warrant	X	X	X	X	X	X	X
844 False Information and Hoaxes	X	X	X	X		X	X
845 Neglect To Protect - Failure To Protect	X	X	X	X	X	X	X
846 Neglect To Protect - Failure To Supervise	X	X	X	X	X	X	X
847 Neglect To Protect - Failure To Train	X	X	X	X	X	X	X
848 Neglect To Protect - Misprison of Felony	X	X	X	X	X	X	X
849 Neglect To Protect - Acting as Accomplice	X	X	X	X	X	X	X
850 Neglect To Protect - Acting as Accessory	X	X	X	X	X	X	X
851 Neglect To Protect - Aiding and Abetting	X	X	X	X	X	X	X
852 Prohibited Activities - Pattern Of Racketeering Acts	X	X	X	X	X	X	X
853 Defamation	X			X		X	
854 Freedom Of Information							

Defendant Named at Paragraph Number	216	217	218	218A	219	220	221
Defendant Common Name	RUBIN	VINDMAN, A	MELBER	MUELLER	CALDWELL	ARPAIO	KATYAL
Claims - Constitutional Rights, Statutory, and Common Law							
801 Bioweapons and Bioweapons Delivery Systems Prohibited	X	X	X	X	X	X	X
802 Terrorism - Violent Crimes In Aid Of Racketeering Enterprises				X			
803 Murder				X			
804 Attempted Murder				X			
805 Conspiracy To Murder				X			
806 Manslaughter				X			
807 Attempted Manslaughter				X			
808 Kidnapping				X			
809 Human Trafficking	X	X	X	X		X	X
810 Torture – Mental and Physical Abuse				X			
811 Conspiracy to Torture				X			
812 Assault				X			
813 Aggravated Battery				X			
814 Soliciting Crime Of Violence				X			
815 Interference With Interstate Commerce By Threats Or Violence				X			
816 Tampering With Witness				X			
817 Tampering With Witness - Evidence				X			
818 Retaliating Against Witness				X			
819 Tampering With Consumer Products				X			
820 Involuntary Servitude	X	X	X	X	X	X	X
821 Peonage	X	X	X	X	X	X	X
822 Forced Labor	X	X	X	X	X	X	X
823 Sexual Abuse	X	X	X	X	X	X	
824 Frauds - Mail	X	X	X	X	X	X	
825 Frauds – Wire	X	X	X	X	X	X	
826 Frauds - Computer Access Devices	X	X	X	X	X	X	
827 Fraud And Related Activity - Computers	X	X	X	X	X	X	

Defendant Named at Paragraph Number	216	217	218	218A	219	220	221
Defendant Common Name	RUBIN	VINDMAN, A	MELBER	MUELLER	CALDWELL	ARPAIO	KATYAL
Claims - Constitutional Rights, Statutory, and Common Law							
828 Attempts And Conspiracy - Frauds By Mail, Wire, Computer	X	X	X	X	X	X	
829 Scheme To Defraud of Honest Services - Mail, Wire, Computer				X	X	X	
830 Property Rights and Illegal Takings	X	X	X	X	X	X	
831 Racketeering - Monetary Benefit				X			
832 Interstate And Foreign Travel Or Transportation For Racketeering Purposes				X			
833 Civil Rights - Free Exercise Of Religion				X			X
834 Posse Comitatus - Use Of Military	X	X	X	X			X
835 Involuntary Servitude	X	X	X	X	X	X	X
836 Intentional Discrimination in Employment				X	X		
837 Peonage	X	X	X	X	X	X	X
838 Conspiracy Against Rights	X	X	X	X	X	X	X
839 Deprivation of Rights	X	X	X	X	X	X	X
840 Deprivation of Rights Under Color of Law	X	X	X	X	X	X	X
841 Civil Rights - Deprivation of Rights Under Color of Law, Anti-Terrorist Forfeiture Protection	X	X	X	X	X	X	X
842 Deprivation of Rights Under Color of Law - Searches and Warrants	X	X	X	X	X	X	
843 Searches Exceed Authority, Malicious Procurement, Without Warrant	X	X	X	X	X	X	
844 False Information and Hoaxes	X	X	X	X	X	X	
845 Neglect To Protect - Failure To Protect	X	X	X	X	X	X	X
846 Neglect To Protect - Failure To Supervise	X	X	X	X	X	X	X
847 Neglect To Protect - Failure To Train	X	X	X	X	X	X	X
848 Neglect To Protect - Misprison of Felony	X	X	X	X	X	X	X
849 Neglect To Protect - Acting as Accomplice	X	X	X	X	X	X	X
850 Neglect To Protect - Acting as Accessory	X	X	X	X	X	X	X
851 Neglect To Protect - Aiding and Abetting	X	X	X	X	X	X	X
852 Prohibited Activities - Pattern Of Racketeering Acts	X	X	X	X	X	X	X
853 Defamation				X			
854 Freedom Of Information							

Defendant Named at Paragraph Number	**222**	**223**	**224**	**225**	**225A**	**226**	**227**
Defendant Common Name	KEENE	MODDERMAN	GIA	FAUCI	CHALOM	UNK GOVT ENTITY	JDOE INDIVIDUAL
Claims - Constitutional Rights, Statutory, and Common Law							
801 Bioweapons and Bioweapons Delivery Systems Prohibited	X			X	X	X	X
802 Terrorism - Violent Crimes In Aid Of Racketeering Enterprises				X	X	X	X
803 Murder				X		X	X
804 Attempted Murder				X		X	X
805 Conspiracy To Murder				X		X	X
806 Manslaughter				X		X	X
807 Attempted Manslaughter				X		X	X
808 Kidnapping				X	X	X	X
809 Human Trafficking	X	X	X	X	X	X	X
810 Torture – Mental and Physical Abuse				X	X	X	X
811 Conspiracy to Torture				X	X	X	X
812 Assault				X		X	X
813 Aggravated Battery				X		X	X
814 Soliciting Crime Of Violence							
815 Interference With Interstate Commerce By Threats Or Violence				X	X	X	X
816 Tampering With Witness					X		
817 Tampering With Witness - Evidence							
818 Retaliating Against Witness					X		
819 Tampering With Consumer Products							
820 Involuntary Servitude	X	X	X	X	X	X	X
821 Peonage	X	X	X	X	X	X	X
822 Forced Labor	X	X	X	X	X	X	X
823 Sexual Abuse				X	X	X	X
824 Frauds - Mail				X	X	X	X
825 Frauds – Wire	X	X	X	X	X	X	X
826 Frauds - Computer Access Devices				X	X	X	X
827 Fraud And Related Activity - Computers	X	X	X	X	X	X	X

Defendant Named at Paragraph Number	222	223	224	225	225A	226	227
Defendant Common Name	KEENE	MODDERMAN	GIA	FAUCI	CHALOM	UNK GOVT ENTITY	JDOE INDIVIDUAL
Claims - Constitutional Rights, Statutory, and Common Law							
828 Attempts And Conspiracy - Frauds By Mail, Wire, Computer	X	X	X	X	X	X	X
829 Scheme To Defraud of Honest Services - Mail, Wire, Computer	X			X		X	X
830 Property Rights and Illegal Takings	X			X	X	X	X
831 Racketeering - Monetary Benefit	X				X		
832 Interstate And Foreign Travel Or Transportation For Racketeering Purposes	X			X	X	X	X
833 Civil Rights - Free Exercise Of Religion				X		X	X
834 Posse Comitatus - Use Of Military	X			X		X	X
835 Involuntary Servitude	X			X	X	X	X
836 Intentional Discrimination in Employment	X			X		X	X
837 Peonage	X			X	X	X	X
838 Conspiracy Against Rights	X	X	X	X	X	X	X
839 Deprivation of Rights	X	X	X	X	X	X	X
840 Deprivation of Rights Under Color of Law				X	X	X	X
841 Civil Rights - Deprivation of Rights Under Color of Law, Anti-Terrorist Forfeiture Protection	X	X	X	X	X	X	X
842 Deprivation of Rights Under Color of Law - Searches and Warrants				X	X	X	X
843 Searches Exceed Authority, Malicious Procurement, Without Warrant				X	X	X	X
844 False Information and Hoaxes		X	X	X	X	X	X
845 Neglect To Protect - Failure To Protect				X	X	X	X
846 Neglect To Protect - Failure To Supervise				X	X	X	X
847 Neglect To Protect - Failure To Train				X	X	X	X
848 Neglect To Protect - Misprison of Felony				X	X	X	X
849 Neglect To Protect - Acting as Accomplice				X	X	X	X
850 Neglect To Protect - Acting as Accessory				X	X	X	X
851 Neglect To Protect - Aiding and Abetting				X	X	X	X
852 Prohibited Activities - Pattern Of Racketeering Acts		X	X	X	X	X	X
853 Defamation		X	X	X	X	X	X
854 Freedom Of Information							

Legally Responsive Answers Requirements

800. Legally responsive answers must include (a) proper identifications of all known and currently unknown defendants, (b) full, complete disclosure of the identities of co-conspirator defendants, and (c) the specific acts, violations, and injuries attributable to and by each defendant, to these plaintiffs. Each and every governmental defendant, each and every individual defendant currently or formerly in the employ of governmental defendants including, without limitation, police powers and intelligence defendant agencies and current and former employees thereof, and each and every other defendant with any relationship with these governmental defendants must provide:

(i) direct answers at all counts at paragraphs 801-854 during any period in which that specific police powers agency or department had any, direct or indirect participations, and/or knowledge, through its own agents, officers, employees, confidential informants, contractors, nominees, and through its relationships with or knowledge of the identities of any and all co-conspirators,

(ii) direct answers to each and every subparagraph cited in each count (claim for relief) at paragraphs 801 through 854,

(iii) direct answers to each and every element of the contents of the tables incorporated in each paragraph 801-854.

This legal responsive answer requirement applies to all named defendants for the purposes of, without limitation, (i) properly establishing direct and indirect joint and several liability for all these acts and conspiracies, (ii) to identify other acts, violations, and injuries not yet known to these named plaintiffs, (iii) to identify further members of this class of plaintiffs, and (iv) to establish liability for the failures to act and other negligence described herein.

801. CLAIMS FOR RELIEF - COUNT 1

Violations of Constitutional Rights Under the First, Third, Fourth, Fifth, Eighth, Thirteenth, Fourteenth Amendments

Bioweapons and Bioweapons Delivery Systems Prohibited

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. §§ 175, 1961-1968, 2339, 2339A
Washington:	RCW § 9A.36.011(1)a, c
New Jersey:	NJ Stat §§ 2C:38-3, 2C:41-1 through 2C:41-6, 10:6-2
New York:	New York Penal L. §§ 120.10, 490.25, 490.55
California:	Cal. Penal Code §§ 203, 206
Massachusetts:	Mass Genl L ch 269 § 14(b)(1)
Arizona:	AZ Rev Stat §§ 13-2301.C.4, 13-2301.C.12, 13-2301.C.14, 13-2301.C.16, 13-2308.03
Texas:	TX Penal Code § 22.02
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process, have and do act in violation of federal and state statutes listed above in this paragraph. The initiation and perpetuation of the development of defendant UNITED STATES' illegal BRMT bioweapon and bioweapon delivery system has been and is the principal initial *rasion d'etre* for these rights and racketeering crimes, and provides the primary *mens rea* for the entire pattern of illegal conduct of defendant UNITED STATES, and that of the co-conspirators in other police powers, intelligence, press, media, entertainment, political, corporate, and other interests which it has entangled in these associated-in-fact enterprise pattern of racketeering acts over the intervening decades in (a) illegal human medical experiments on human subjects, (b) the religious discrimination used to select the initial victim plaintiffs for this illegal experimentation and to pretext and entangle their children, including the Lead Plaintiff, (c) the pattern of deliberate national security entanglements, (d) human experiments ranging from human relationship management to inducing medical

emergencies to human trafficking, (e) racketeering acts of all forms including career, interstate commerce, financial and other property crimes, (f) multiple lethality attempts and murders, (g) entanglements and inculpations of press, media, and entertainment industry persons.

B. Defendant UNITED STATES has and does (i) spend billions of dollars through various government departments including, without limitation, defendants DOD and its departments and agencies, through defendant DOJ and its departments and agencies, and other federal departments and agencies, and has and does (ii) pretext and entangle these co-conspirators, using a variety of illegal means and methods, to accomplish this illegal and criminal violation of law, 18 U.S.C. § 175:

> "(c) For purposes of this section, the term "for use as a weapon" includes the development, production, transfer, acquisition, retention, or possession of any biological agent, toxin, or delivery system for other than prophylactic, protective, bona fide research, or other peaceful purposes."

and violation of the ratified 1972 Bioweapons Treaty, paragraphs 803M-O, and (iii) has and does perpetuate these criminal offenses through its continuing its criminal violations of our Constitution and laws and those of its co-conspirators including, without limitation, RICO 18 U.S.C. §§ 1961-1968,, for (a) the illegal purposes of politically and economically sustaining this illegal program and for (b) the illegal cover-up of this conspiracy.

C. Defendants' decades long program of sustained physical, psychological, and biomedical abuse of this class of plaintiffs to and including death including, without limitation, of Lead Plaintiff, provide defendant UNITED STATES with consistent and well-known and studied human subjects, which are the same in form and function as its former practice in the federal National Institutes of Health, of painful medical experimentation on apes and other advanced animal subjects, which were discontinued against those animals in 2015. This illegal human experimentation, in Lead Plaintiff's own case from age 12 to his present age of 68, on

meticulously well-known human platforms has been and is abuse which extends and perpetuates the development of the illegal BRMT bioweapon and bioweapon delivery system.

D. Defendant UNITED STATES has and does economically benefit both directly and indirectly from each and every act, violation, and injury against rights and property by this specific means. Defendant UNITED STATES is, for this specific illegal purpose, the principal criminal actor in this associated-in-fact enterprise, even when it does not directly and immediately benefit from a specific act, violation, or injury by receiving the direct proceeds of that specific act, violation or injury, whether or not it explicitly conspired to conduct that specific act with its co-conspirators. Effectively, defendant UNITED STATES gets its cut of each and every rights and racketeering robbery undertaken by this gang of associated-in-fact enterprise racketeers, through its further development of its illegal BRMT bioweapon and bioweapon deliver system on these involuntary human subjects, even though its co-conspirators in this associated-in-fact enterprise do not deliver a specific cut of the direct proceeds of a particular specific act, violation, or injury directly to defendant UNITED STATES.

E. Nazi doctors and their research assistants worked for Dr. Josef Mengele in this same fashion, sharing the results of their heinous experiments on human subjects to benefit the state (Germany) at various Dachau Concentration Camps. Those human subjects were objects of religious, political, ethnic, and sexual orientation discrimination, confined both with and without "due process" in Germany and other territories controlled by Nazi Germany, principally between 1942 and 1945, a 3 year period. Seven of those criminal medical experiment perpetrators received death sentences, nine received ten years to life sentences, and seven were acquitted for those illegal experiments on human subjects, to and including permanent physical and psychological disabilities and deaths of those human subjects.

F. Defendants CIA's MKULtra and FBI's Cointelpro programs, both illegal, ran for 20 years and 15 years respectively, and included well-documented illegal human medical experiments with 100 million doses of LSD, myriad rights violations, and documented direct violence against US persons. No criminal consequences ever resulted to any defendant UNITED STATES government employee or contractor for these crimes, nor for the destruction of evidence which obstructed justice for defendant UNITED STATES' innocent and unwitting victims, which hit was constitutionally created and obligated to protect.

G. Defendant UNITED STATES, specifically defendant DOJ including, without, limitation, its leader GARLAND, known to and by Lead Plaintiff as Robert Mandich in 1974-1976 (paragraphs 5, 99m, 211, 417-419), continues this associated-in-fact enterprise pattern of acts, rights violations, and conspiracy today, specifically ignoring criminal offenses in federal departments and agencies (paragraphs 550-584), and those of its co-conspirators who would thereby inculpate defendant DOJ directly into this criminal conspiracy for their own defense and cross-claims.

H. This illegal BRMT bioweapon and bioweapon delivery system program has been run by defendant UNITED STATES on these involuntary servants, chosen by discriminating against their religious beliefs and practices in national service from at least 1968 to 2024, more than 56 years so far. The Lead Plaintiff's own great-great grandfather served as a Quaker conscientious objector in President Lincoln's day to free slaves through four years of the Civil War, winning the Medal of Honor at Appomattox in 1865 while faithfully serving defendant ARMY as a company bugler. Seventy-nine medical corpsmen, and one bugler, serving as conscientious objectors, have each won one of the 3,535 Medals of Honor awarded in its history from 1861. His issue have now been enslaved as the involuntary servants of defendant UNITED STATES for four generations, in violation of the 1865 *Fourteenth* Amendment.

I. Lead Plaintiff, as part of the third generation of involuntary servants, has been functionally enslaved and human trafficked by defendant UNITED STATES for more than 56 years (as of 2024) based upon that same set of his Quaker-based family's religious beliefs and practices, which religious discrimination was first prejudicially used by defendant ARMY during military service, and by defendants CIA and ARMY thereafter to select him by age 12, as a direct result of his father's faithful and honorable service to defendant ARMY when called to service during the Korean War.

J. By this pattern of practice, defendant UNITED STATES also selected the Lead Plaintiff's uncle for this same discrimination, most probably initiated at Whitman College, Walla Walla, WA prior to military service in defendant ARMY during the Vietnam War. Defendant UNITED STATES has since perpetuated this malign pattern of religious discrimination and criminal conduct to others in this religious family including, most probably from childhood, toward Audrey (a granddaughter), who was murdered in September 2011 at age 18, and her alleged and convicted intermediary assailant, both of whom were also most probably being biochemically hijacked by defendant CIA using the illegal BRMT bioweapon and bioweapon delivery system in the preceding months during their relationships with the male partner they both knew, in the preceding events leading directly to the confrontation, and in the violent moment of that criminal act (paragraphs 10, 412, 413, 600B, 803I, Interline Exhibit1). Defendant CIA's malignant purpose and intent was to conduct a field development test of the ability to create and sustain a lethal violent sequence by an illegal BRMT bioweapon hijacked human subject, using the illegal BRMT bioweapon and bioweapon delivery system to control emotions and muscle movements in the violent moment (paragraphs 803, 805) to secure the lethal effect it did achieve, the longitudinal severing of the carotid artery, creating the medically unrepairable injury which resulted in Audrey's death. Lead Plaintiff has also experienced similar forms of

specific patterned muscular control by the illegal BRMT bioweapon and bioweapon delivery system as described in this complaint (paragraphs 58(1), 537(b), (c), (e), (m)), though these numerous attempts have only resulted in injuries to date.

K. This murderous act against Audrey, performed by a non-violent intermediary as the very unlikely perpetrator (a woman with no prior violent history of any kind who had been abused by the misogynist third party male who had attracted both women to this specific moment of violence through his prior pattern of acts and abuse) was, in fact, a surreptitious development field test of the illegal BRMT bioweapon and bioweapon delivery system.

L. This violent development test (Audrey's murder) directly emulates one of defendant CIA's MKUltra goals for its supposed MKUltra LSD superweapon, a human agent or intermediary who could be programmed through hypnosis and drugs to commit an assassination and entirely forget the matter thereafter. Lead Plaintiff's own short-term memory function has been repeatedly effected then restored in this way on an incident by incident basis, but the illegal BRMT bioweapon and bioweapon delivery system has never successfully been used to erase or delete long term memory sequences of events nor been able to sustain any long duration impairment of longer-term visual memories.

M. A farfetched and delusional concept? No, a stated mind control objective of defendant CIA which it never disavowed (Interline Exhibit 3), and entirely consistent with defendant CIA's on-going scofflaw behavior (paragraphs 51, 102(i), 320, 332, 340, LPEE pages 237-271, 6885-7466) and that of federal police powers agencies, none ever criminally pursued by defendant DOJ for any systemic institutional crimes. Whistleblowers are punished regardless of laws prohibiting such reprisals. Federal institutional crimes go unnoted and unindicted - MKUltra criminal drug distribution and illegal human experimentation to death; Cointelpro rights violations and violence to death; FISA rights violations; Section 702 rights violations; the illegal

personal, family, business and financial wreckings of Americans in which Lead Plaintiff was unwittingly victimized, pretexted, and entangled by federal police powers defendants, are all well documented throughout this complaint and in Congressional and federal Court findings described herein. Reinforcing the "unalienable" constitutional, civil, and human rights of these plaintiffs and other US persons is the specific remedial purpose of this litigation. It is undertaken specifically in light of defendant DOJ's known and documented history of (i) negligence and neglect to prevent practiced across decades, as specifically participated in by its current leader GARLAND, (ii) of fraudulent concealment and knowing willful blindness (paragraphs 550-584), and (iii) its documented history of absolutely no broad-based criminal prosecutions for publicly known broad-based institutionally tolerated misconduct in police powers and intelligence operations (paragraphs 307-313).

N. These associated-in-fact enterprise patterns of practice have or do persist for decades while these institutional perpetrators and their executive management teams go unpunished for serial criminal violations - moving on to other federal positions and to eventual government pensions when crimes have been committed against US persons include, without limitation, Gottlieb – MKUltra principal; BREYER, past BRMT principal; BURNS, past BRMT principal; GARLAND, past BRMT field operations; WEISSMAN, ROSENBERG, MELBER, past racketeering acts; and to have police powers buildings named after them (Hoover, FBI's Cointelpro principal). This provides the individuals in this gang of unindicted felons with direct and immediate economic benefits (illegal programs and practices sustained, current positions and career paths continued), and indirect economic benefits (paths to future pensions and other forms of prosperity). This pattern of corrupt practices of fraudulent concealment and neglect to prevent illegal acts, violations, and injuries provides defendant UNITED STATES with the direct and indirect economic benefits of a group of meticulously well-researched and reliable human

subjects for its illegal experimentation. Defendant UNITED STATES has and does systematically abuse these specific human subjects as it continues its decades long illegal human biochemical brain hijacking of these plaintiffs using the illegal BRMT bioweapon and bioweapon delivery system. These illegal biomedical experiments on human subjects for illegal bioweapons development testing, and deployment are comparable in scope to the criminal offenses tried in the 1946-1947 Nuremberg Doctors Trial, though they are at least five decades longer in duration than the three years of illegal experiments by those Nazi doctors, some of whom received the death penalty for their illegal medical experiments.

O. By this means of religious discrimination, defendant UNITED STATES has and does sustain a functional bill of attainder across generations against these plaintiff victims in its secret police state of involuntary servitude and subjugation. The democratic republic which defendant UNITED STATES was created in the founder's vision to affirmatively "secure unalienable rights" of the People has been systematically perverted. Defendant UNITED STATES sustains administrative prerogatives, rather than unalienable rights, against people it selected generations ago as its human guinea pigs based upon their religion and upon their honorable service as conscientious objectors, and has and does abuse these US persons to subvert the very purpose defined during the founding of our nation in the Declaration. Defendant UNITED STATES mission to "establish justice," one of the five principal purposes for which the federal Constitution was ratified by the states of the United States of America, has been subverted to its own willful blindness, fraudulent concealment, and racketeering crimes, perpetrated by defendant DOJ and its police powers agencies, particularly defendants FBI and USMS. Defendant UNITED STATES has and does knowingly choose to subvert and pervert these objectives and to defy the constitutional limits placed upon government power and to subvert

purposes which are prescribed in our Constitution, trading its own imagined security (and conduct of impunity) for these plaintiffs' actual liberty and for their lives.

P. Defendant UNITED STATES has and does act in violation of federal and state statutes listed above in this paragraph and Article 1 of that certain Senate ratified international treaty *"Convention on the Prohibition of the Development, Production and Stockpiling of Bacteriological (Biological) and Toxin Weapons and on Their Destruction*" in its long history of violations against Lead Plaintiff and other plaintiffs of this class and its prior and on-going operation, management, and collaboration with other defendants in their pattern of racketeering acts, conspiracies, violations of rights, interference with interstate commerce, and other crimes and rights violations to cause and create injuries to the Lead Plaintiff and other plaintiffs of this class, including, without limitation, those specifically cited and described in the 110 subcounts at paragraphs 600-710 in this Complaint, both within and without the territory of the United States.

Q. PL 91-452, Racketeering Influenced and Corrupt Organizations Act of 1970, as amended, provides for recovery for individuals injured by associated-in-fact enterprises engaged in patterns of racketeering acts, including a specific list of crimes and injuries defined in 18 U.S.C. § 1961(1), which includes the crime(s) and injuries listed in this Claim For Relief. As stated in 18 U.S.C. § 1962(c) it is

> "unlawful for any person employed by or associated with any enterprise engaged in, or the activities of which affect, interstate or foreign commerce, to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity or collection of unlawful debt."

As stated in 18 U.S.C. § 1962(d) it is unlawful for:

> "any person to conspire to violate any of the provisions of subsection (a), (b), or (c) of this section."

R. These acts, violations, and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and

continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family and this religious group, and to other yet unknown plaintiffs, by defendant UNITED STATES and its co-conspirators.

S. The Ku Klux Klan Act of 1871, 42 U.S.C. § 1985(3), provides for recovery for individuals injured by conspiracies:

> " If two or more persons in any State or Territory conspire or go in disguise on the highway or on the premises of another, for the purpose of depriving, either directly or indirectly, any person or class of persons of the equal protection of the laws, or of equal privileges and immunities under the laws; or for the purpose of preventing or hindering the constituted authorities of any State or Territory from giving or securing to all persons within such State or Territory the equal protection of the laws; or .....; in any case of conspiracy set forth in this section, if one or more persons engaged therein do, or cause to be done, any act in furtherance of the object of such conspiracy, whereby another is injured in his person or property, or deprived of having and exercising any right or privilege of a citizen of the United States, the party so injured or deprived may have an action for the recovery of damages occasioned by such injury or deprivation, against any one or more of the conspirators."

T. Under our Constitution, all US persons are entitled to equal protection of the laws. Neither equal nor unequal predations of rights were intended as the primary purpose of any government, whether defendant UNITED STATES or any state or locality. Despite the explicit constitutional prohibitions on governmental predations of individual rights, Privileges, and Immunities, which prohibitions adopted in the Bill of Rights were specifically required for ratification of the Constitution in 1788 by those concerned about liberty and overreach by a powerful federal government, and which led to the 1791 ratification of the Bill of Rights, defendant UNITED STATES and co-conspirator defendants have and do act in a long-running pattern of direct and systematic violations of the constitutional rights to equal protection and other rights from at least 1968, by perpetrating and sustaining defendant UNITED STATES' discriminatory pattern of unequal protection against these plaintiffs in their practices of religion, commerce, assembly and other *unalienable individual constitutional rights* while fraudulently

concealing its own and co-conspirators' criminal conduct behind its color of law abuse of the *conditioned privilege of state secrets* and behind the *willful blindness* of defendant DOJ.

U. Defendant DOJ has and does sustain complete silence and willfully refuse all prosecutions of these institutional criminal offenses in the illegal human experimentation upon these plaintiffs, while acting as a key conspirator in defendant UNITED STATES' conspiracy among its own departments and agencies in the overall associated-in-fact enterprise with co-conspirators having direct knowledge of this illegal weapon, (i) to sustain and fraudulently conceal this unlawful development (prohibited under 18 U.S.C. § 175 and 1972 Bioweapons Treaty) of the illegal and prohibited BRMT bioweapon and bioweapon delivery system, (ii) to pretext and entangle these plaintiffs in other illegal acts and patterns of acts by defendant UNITED STATES departments and agencies, and by other police powers departments and agencies acting against the rights of other US persons while (iii) defendant UNITED STATES fraudulently conceals its associated-in-fact enterprise pattern of racketeering acts and constitutional rights violations of religion, property, free assembly and other crimes (18 U.S.C. §§ 241, 242, among others) behind its color of law abuse of the conditioned privilege of state secrets and (iv) has and does act directly against these plaintiffs despite the repeated specific and direct pleas of these plaintiffs delivered in writing and by hand, complete with the *prima facie* evidence of these criminal offenses against rights.

V. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and

(iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	Facts - Subcount Series	Subcount(s)
600-603	NSEC National Security Pretexting and Entanglements	1-4
604-620	HEXP Illegal Human Experimentation	1-16
621-637	RGTS Individual Rights Violations and Conspiracies	3, 4
639-693	RICO Racketeering	1
694-710	LTHL Lethality Attempts	1-17

802. CLAIMS FOR RELIEF - COUNT 2

Violations of Constitutional Rights Under the First, Fourth, Eighth, Thirteenth, Fourteenth Amendments

Terrorism - Violent Crimes in Aid of Racketeering Enterprises

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. §§ 1961(1)(G), 1961-1968, 1992(b)(3), 2339, 2339A
Washington:	RCW § 9A.36.011(1)a, c
New Jersey:	NJ Stat §§ 2C:38-2, 2C:41-1 through 2C:41-6, 10:6-2
New York:	New York Penal L. §§ 110.00, 120.10, 125.27(a)(v), 460.00 through 460.80, 490.25, 490.55
California:	Cal. Penal Code §§ 203, 206
Massachusetts:	Mass Genl L ch 269 § 14(b)(1)
Arizona:	AZ Rev Stat §§ 13-2301.C.4, 13-2301.C.12, 13-2301.C.14, 13-2301.C.16, 13-2308.03
Texas:	TX Penal Code § 22.02, 71.02
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph.

B. Defendants have and do plan, conspire, perpetrate and engage in, among other violent and threatening acts, injuries, and violations at the final subparagraph in this paragraph, an act of violence on a rail mass transit express train operating on the Metropolitan Transportation Authority Hudson River Line north of New York City on September 11, 2022 as described in paragraph 707 LETHL-14. This event occurred in a sequence of violent threats and acts occurring in the four months between mid-July 2022 and November 2022, which are further described at Complaint Interline Exhibit 15: Indirect Verbal Threat and Subsequent Lethality Events. Other domestic terror incidents intentionally associated indirectly by defendants with Lead Plaintiff to serve their corrupt purpose to discredit through indirect association with Lead Plaintiff include, without limitation, the 2004 Bio-Lab arson fire and 2009 US Airways Flight 1549, paragraphs 602 NSEC-3, 606A-D HEXP-3, 673 RICO-35, which are elements of these defendants' overall pattern of domestic violence and sabotage for the reasons cited therein,

which are supported by the historical patterns of facts found by Congressional investigations of the violent defendant CIA MKUltra LSD drugging and defendant FBI Cointelpro programs which targeted individual US persons and groups for their political and religious beliefs and practices (LPEE pages 237-271, 6885-7466) during the same time periods as the illegal BRMT bioweapon and bioweapon delivery system and illegal human subject medical experiments were being conducted and used against US persons.

C. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	Facts - Subcount Series	Subcount(s)
602	NSEC National Security Pretexting and Entanglements	3
606	HEXP Illegal Human Experimentation	3
	RGTS Individual Rights Violations and Conspiracies	
	RICO Racketeering	
694-710	LTHL Lethality Attempts	1-17

803. CLAIMS FOR RELIEF - COUNT 3

Violations of Constitutional Rights Under the First, Fourth, Eighth, Thirteenth, Fourteenth Amendments

Murder

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. §§ 175, 1111, 1961-1968; 42 U.S.C. 1985(3)
Washington:	RCW §§ 9A.32.030(1)a, b
New Jersey:	NA
New York:	NA
California:	NA
Massachusetts:	NA
Arizona:	NA
Texas:	NA
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph.

B. Defendants have and do plan, conspire, perpetrate and engage in causing and creating injury and death to members of the Lead Plaintiff's family of origin and extended family.

C. Sandra Darlene Brewer (age 11) died of Reye Syndrome at Mary Bridge Children's Hospital, Tacoma, WA, from a medically prescribed aspirin/codeine dosed death during an episode of influenza in April 1970, at the hand of that certain federally embedded medical doctor KOHLER (paragraphs 99d, 417, 418, 714, 740, 803C-D, 805B(i), H, S, BS, 806B, 814B), now deceased, then practicing medicine in Federal Way, WA, where Lead Plaintiff lived with his

family of origin (age 14). See paragraphs 99d, 211, 417-418. Sandra was a minor child and member of the Lead Plaintiff's family of origin, which family had been secretly subjugated in involuntary servitude to defendant UNITED STATES based upon religious discrimination as described at paragraphs 1-5, 403-418 for the illegal purposes described therein and throughout this complaint.

D. Reye syndrome, first medically described in 1963, paragraph 805H, is a rapidly worsening brain disease. The brain swells in the skull with fluid buildup and toxicity, as liver function fails, from internal compression against the irregular jagged interior surfaces of the skull and through fluid pressure bursting cell walls as fluid pressure builds, leading to convulsions, to loss of consciousness, and to eventual brain death. About 90% of cases in children are associated with aspirin (salicylate) use. Sandra was in bed suffering from influenza and a headache in the morning as Lead Plaintiff left for school. When Lead Plaintiff returned from school around 2:30PM, he tried to comfort her as she was holding her head and wincing and crying in pain as she rocked upright from her prone position in her bed, back and forth in very clear pain. In late afternoon, around 4-5PM, she was transported by ambulance to Mary Bridge Children's Hospital in Tacoma, WA. Sandra died about 2AM from the overdose of aspirin (which caused the brain swelling) and codeine (which suppressed the sensations of pain as the swelling and cellular destruction continued to the point of death) prescribed by Dr. KOHLER (paragraphs 99d, 417, 418, 714, 740, 803C-D, 805B(i), H, S, BS, 806B, 814B), then presenting as a family physician who was embedded in a medical clinic in Federal Way, WA, where the parents had managed to buy a house they could afford about 150 feet west of the Interstate 5 freeway about 1200 feet from a King County garbage dump.

E. The current (2024) on-going defendant CIA psychological and physical gratuitous tradecraft cruelty "rhyme" with Sandra's death at age 11 is Lead Plaintiff's colon block medical

issue which requires on-going medication which would otherwise lead to liver failure if chronically sustained. Lead Plaintiff began experiencing these colon blocking symptoms in August 2023 (LPEE pages 11656-11664, LPEEV65-2) and used a series of medication which worked for about ten days, then stopped working one after another, indicative of an illegal BRMT bioweapon block rather than a natural medical condition. Symptoms are currently on-going as Lead Plaintiff also continues to use low dose aspirin daily (the critical medical cause of Sandra's death as noted above) to treat chronic symptoms of deep vein thrombosis (DVT) experienced in 1994 soon after a fraudulent financing trip to London with CORNWELL (CIA) described at paragraph 601 NSEC-2. Cardio symptoms of no note to cardiologist ASTUDILLO in 2022 as age related also were suddenly of great interest to the cardiologist about the same time the colon issue emerged, as documented in the programmed health collapse subcount at paragraph 710 LETHL-17. This classic defendant CIA gratuitous cruelty is comparable to other similar patterns of practice by defendants FBI, USMS, and CIA experienced by Lead Plaintiff over many years wherein defendants echo prior traumas in an attempt to trigger psychological stress to push their subject toward acting out in some form, as part of their overall pattern of racketeering acts during their sustained human trafficking, targeting, and entrapment operations.

F. Defendants CIA and ARMY intent was to use Sandra's death in 1970 to inflict one in a series of emotional traumas on family members including Lead Plaintiff, and just three months prior to the deaths of both paternal great grandparents in this very close knit family, all between January and August 1970, during defendant CIA research to develop its early versions of the illegal BRMT bioweapon. This sense of psychological trauma was further magnified as these deaths occurred within seven months after the birth of the youngest child in the family,

G. Defendant CIA then had a documented history of such accidental appearing deaths in its assassinations record and described such methods in its official Assassination Manual (an

official internal publication later discontinued). The CIA MKUltra program had previously murdered Frank Olson, a former ARMY Biomedical Researcher contracted to CIA, in 1953 soon after he objected to certain illegal and unethical practices which were subsequently employed as elements of CIA's illegal MKUltra biomedical experiments which used 100 million LSD doses in secret on American and Canadian citizens and soldiers (paragraph 359-363). The Olson family received an official apology for that murder from President Ford in 1975.

H. Defendant CIA's MKUltra program first came to public notice in 1973, three years after Sandra's death. By 1970, defendant FBI had already human trafficked Lead Plaintiff's unwitting family to California beginning in Summer 1961 to destroy evidence of its Cointelpro violence using his unwitting father to destroy evidence of crimes traceable to FBI against civil rights activists by recycling medical x-rays from the sales targets list (clinics and hospitals where it had tracked the victims of violence). Its cover company, Pacific Paper Products, provided sales leads to Lead Plaintiff's father which targeted those specific clinics, along with the added commission incentives for this x-ray film (silver) recycling (evidence destruction) program (paragraphs 414-416). Defendant FBI's Cointelpro was publicly revealed in 1971 after a citizen-activist burglary, one year after Sandra died (paragraphs 51, 61, 332, 406, 600C NSEC-1). Lead Plaintiff's family was reassigned soon after Sandra's 1970 death from its long-time home church congregation to one led by an impostor elder, defendant BREYER (ARMY, CIA) while he was known as elder "Snow" in Kent, WA, in late Spring or Summer 1970 (paragraph 99d, 211, 417, 606L HEXP-3).

I. Audrey Brewer (age 18), the daughter of Lead Plaintiff's cousin, was murdered in Walla Walla, WA by a knife slashing of her carotid artery on September 6, 2011, at the hand of an emotionally and physically traumatized and otherwise completely non-violent female. Both Audrey and the perpetrator were most probably abused both preceding (by hijacking oxytocin –

the “love” hormone) and during that violent homicide (by hijacking adrenaline – the “fight or flight” hormone) in an extreme event which resulted in Audrey’s death, through hormone hijacking by defendant CIA using the illegal BRMT bioweapon and bioweapon delivery system, While this entire sequence was closely observed and manipulated by a misogynistic male who had abused both women psychologically and/or physically, and was the apparent psychological catalyst for this violent event (paragraphs 10, 412, 413, 600B, Interline Exhibit 1), defendant CIA lurked in the background waiting for the optimum moment to conduct its lethal field test.

J. Audrey was murdered using the illegal BRMT bioweapon and bioweapon delivery system. During the lead-up to the violent sequence, BRMT illegally dosed oxytocin to both women at varying times both by a remote operator operating in proximity in public spaces and by secret video monitoring typically embedded in electronic devices which are permanently connected to electricity sources (televisions, computers, cell phones, fire detection devices, carbon monoxide alarms and similar devices) to observe both women over time, so as to time the oxytocin dosing abuses of both Audrey and her assailant for the purpose of orchestrating the relationships, then adrenaline to orchestrate and magnify the biochemical sense of conflict, confrontation, and the specific violent incident which led to Audrey’s death, for the purpose of testing and evaluating the modern illegal BRMT bioweapon’s effectiveness in creating and sustaining violent events. Such field tests validate the BRMT bioweapon and bioweapon delivery system for use in defendant CIA assassinations by remote means in otherwise apparently natural scenes and circumstances of violence. This is consistent with CIA’s documented past pattern of practice (paragraphs 359-402), including in Frank Olson’s death by LSD overdose and subsequent toss from an upper floor hotel window in NYC after he raised ethical and legal concerns about the illegal MKUltra program (see at paragraph 802H above). The ability to manipulate extreme emotion and control physical violence are not in doubt and are also directly

echoed in lethality attempts against the Lead Plaintiff including, without limitation, at paragraphs 58(1), 537e, 614 HEXP-11, 700, 701, 708 Lethl-7, 8, 15. Interline Exhibit 15C.

K. An additional tragic consequence of this murder and subsequent trauma was the divorce of Audrey's parents, Lead Plaintiff's cousin and his spouse. That trauma was similar to the marital trauma Lead Plaintiff's family nearly suffered in the 4-5 years after Sandra's death. Divorce was and remains extremely rare among members of this very close-knit Quaker-based religious group which has extraordinarily strong conservative family values.

L. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family and this religious group, and to other yet unknown plaintiffs, by defendant UNITED STATES as related at paragraphs 403-584.

M. The illegal BRMT bioweapon and bioweapon delivery system, and its fraudulent concealment are among the principal underlying causes and motivations (*mens rea*) of the extraordinary variety of knowing criminal offenses and civil acts, violations, and injuries in this complaint against constitutional rights, all of which are constitutionally and statutorily prohibited to defendant UNITED STATES and its co-conspirators, both within and without the territory of the United States of America. The President negotiated and presented to the Senate the *Convention on the Prohibition of the Development, Production and Stockpiling of Bacteriological (Biological) and Toxin Weapons and on Their Destruction*. The Senate ratified this 1972 international treaty (referred to as the "*Bioweapons Treaty*" herein) on December 16, 1974. The treaty was signed by the President on January 22, 1975, and thereby attained the force of law in the United States of America on that date and entered into force internationally on March 26, 1975. Under treaty Article I (emphasis added):

> "Each State Party to this Convention undertakes never in any circumstances to develop, produce, stockpile or otherwise acquire or retain: (1) Microbial or other biological agents, or toxins whatever their origin or method of production, of types and in quantities that have no justification for prophylactic, protective or other peaceful purposes; (2) Weapons, equipment or means of delivery designed to use such agents or toxins for hostile purposes or in armed conflict."

N. As defined at 18 U.S.C. § 178(2):

> "toxin means the toxic material or product of .... animals....a recombinant or synthesized molecule, whatever their origin and method of production, and includes – any....biological product that may be engineered as a result of biotechnology produced by a living organism; or... any...biological product..."

O. The 1972 *Bioweapons Treaty* prohibits any form of biological agent from being developed or used for hostile purposes, which purposes include hostile use against any US person. Since the BRMT bioweapon and bioweapon delivery system directly hijacks (forcibly takes over) the brain's natural biochemistry to immediately alter the biochemistry of the victim, this is an assault under law, as it is done without the knowledge or consent of the victim. As a biological weapon, BRMT acts directly upon the brain to control the voluntary and involuntary systems of the body, ranging from thought to muscle contraction to heart rhythm and breathing, including to alter, disrupt, or halt these systems and organs. Foreseeable injuries from its prohibited use can include a broad array of injury from mental malfunction of thought to physical injury and death. As research, development, and deployment of the illegal BRMT bioweapon, bioweapon delivery technology, and neurological science have all progressed since the 1970s, the capability of this illegal BRMT bioweapon and bioweapon delivery system has evolved from crude disruption of hormonal systems (such as adrenaline – "fight or flight," melatonin – "sleep" - and oxytocin –"love"- suppression and extreme dosing) using a local bioweapon device; to highly granular hijacking of thought, action, behavior, and control of involuntary biological functions including, without limitation, breathing, heart rhythms,

emotions, and reactive muscle movements, among other things; all of which can now be remotely and very precisely controlled, both as individual illegal acts against a person, and as lengthy sequences of illegal acts against a person by defendant UNITED STATES. Defendant UNITED STATES can and does literally hijack some to all of the biochemistry of the body of a human being or other sentient being using BRMT. This is a clear and transparent hostile assault using an illegal and internationally prohibited bioweapon and bioweapon delivery system in violation of the 1972 Bioweapons Treaty by defendant UNITED STATES. In so doing, defendant UNITED STATES also violates ratified international treaties on civil rights and torture, which also have force of law at all levels of government under the Constitution's federal supremacy clause, as discussed in this Complaint; as well as US law, as described in this complaint.

P. The clear criminal offenses (18 U.S.C. § 175) and civil acts, violations, and injuries underlying this entire conspiracy, as alleged herein and as will be further developed and affirmed through discovery are, are in part related to, and are in part motivated by, defendant UNITED STATES' illegal development and deployment of Brain Remote Management Technology (BRMT). BRMT, a prohibited bioweapon and bioweapon delivery system, has been and is used by defendant UNITED STATES acting alone, and in conspiracy with others, to assault US persons and other innocents in its criminal color of law abuse and "state secrets" violations of the ratified 1972 *Bioweapons Treaty*. Further, defendant UNITED STATES has and does engage in an on-going conspiracy to fraudulently conceal, cover up, and sustain this illegal pattern for over five decades of its willful and knowing violations of the treaty, of the US Constitution, and of its violations of its legal obligations to US persons and other innocents. In doing so, defendant UNITED STATES has and does directly and knowingly violate 18 U.S.C. § 175:

> "Whoever knowingly develops, produces, stockpiles, transfers, acquires, retains, or possesses any biological agent, toxin or delivery system for use as a weapon, or knowingly assists a foreign state or any organization to do so, or attempts, threatens, or conspires to do the same, shall be fined under this title or imprisoned for life or any term of years, or both. There is extraterritorial Federal jurisdiction over an offense under this section committed by or against a national of the United States."

Q. This illegal and internationally prohibited BRMT bioweapon and bioweapon delivery system most probably originated in the late 1960s or early 1970s, leveraging the illegal biomedical human hormone hijacking experiments conducted on Lead Plaintiff in 1968, and most probably on other unknown victims in the 1960s. Throughout the entire illegal progression, from 1940s origins in Hitler's Dachau Concentration Camps, through defendant UNITED STATES' secret import of that program's doctors, scientists, and technicians at the end of World War II, to eventually become defendant CIA's program director Dr. Sidney Gottleib's MKUltra LSD drugging program, and through its continuation as the illegal and prohibited BRMT bioweapon and bioweapon delivery system, defendant UNITED STATES has and does violate our Constitution and US law through (i) its own myriad departments and agencies coordinated to engage in patterns of racketeering acts (as they are known under PL 91-452, RICO, and the amendments thereto since 1970) and (ii) by engaging co-conspirator defendants including other police powers and intelligence agencies, press, and other interested persons and groups in its conspiracy. Defendant UNITED STATES, through its own and its co-conspirator defendants' broad array of criminal and civil violations, subterfuges, injuries, and deaths, all under color of law, has been and continues to employ originating and sustaining principals and other knowing co-conspirators (including, without limitation, defendant BURNS, and GARLAND), using a broad array of police powers and intelligence operations as an associated-in-fact enterprise to engage in an evolving pattern of racketeering acts and rights violations against US persons and other innocents, such as against the Lead Plaintiff and other plaintiff victims of this class.

R. As such, defendant UNITED STATES has been, is, and continues to be, directly liable, as well as indirectly and vicariously liable, for the conduct of all acts, violations, and injuries against Lead Plaintiff and this class of injured plaintiffs. This class of plaintiff victims includes those who are, without limitation, direct victims, heirs of deceased persons, permanently disabled persons, and others who have had their properties, businesses, and families destroyed, been incarcerated as a result of defendants' predicate acts, and have and are otherwise directly or indirectly injured by these willful and knowing acts, and by the on-going violations of this associated-in-fact enterprise, which has over time grown to encompass a wide variety of domestic and international police powers and intelligence operations, as well as press, other entities, and individuals. 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.

804. CLAIMS FOR RELIEF - COUNT 4

Violations of Constitutional Rights Under the Fourth, Fifth, Eighth, Fourteenth Amendments

Attempted Murder

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. §§ 175, 956, 1113, 1119, 1961-1968, 2332b; 42 U.S.C. 1985(3)
Washington:	RCW § 9A.28.020
New Jersey:	NJ Rev Stat §§ 2C:5-1, 2C:11-3, 2C:41-1 through 2C:41-6, 10:6-2
New York:	New York Penal L. §§ 110; 125.27(a)(v), 460.00 through 460.80, 490.25
California:	Cal Penal Code §§ 187(a)/664
Massachusetts:	NA
Arizona:	NA
Texas:	NA
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Paragraph 803 subparagraphs E through Y are specifically incorporated by reference

to avoid their repetition in this paragraph. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph.

B. Defendants have and do plan, conspire, perpetrate and engage in attempts to cause and create injury and death to the Lead Plaintiff as specifically cited and described at final subparagraph of this paragraph 804 below, both within and without the territory of these states and of the UNITED STATES. Defendants have and do act, in their series of conspiracies and attempts to defraud, entrap, incriminate, discredit, disable, and/or destroy the Lead Plaintiff, as particularly cited and described in each subcount in the table at the next subparagraph below, both within and without the territory of these states and of the United States. This long-running, comprehensive, and systematic pattern of associated-in-fact enterprise racketeering acts has and does sustain the fraudulent concealment of (i) the illegal BRMT bioweapon and bioweapon delivery system, of (iii) the associated-in-fact illegal enterprise itself, of (iii) continuing obstructions of justice both by acts and by willful blindness, and (iv) perpetuate the destruction of evidence of prior criminal acts, and of acts, injuries, and violations of constitutional, common law, and statutory Privileges and Immunities, by these defendants, all directed without legal cause under color of law at these specifically targeted plaintiffs. Discovery will provide further specific evidence relevant to each noted incident and more incidents of such acts, both survived by the targeted persons and likely not survived, against members of this class of plaintiffs. These acts, violations, and injuries are representative of those perpetrated by these defendants on this class of plaintiffs.

C. Lead Plaintiff is an active person who regularly engages in exercise, has an excellent sense of balance, and a demonstrated history of sports and other activities which have not, on their own, led to any loss of balance. Lead Plaintiff is an extremely emotionally stable person not

prone to panic, phobias, or irrational thoughts or thought processes, with strong and deep analytical professional education, training, and experience. See paragraphs 320e, LPEE pages 190-236. Lead Plaintiff has and does have regular medical examinations and tests (except between June 2008 and October 2010 during the period when defendant CIA added remotely applied physical torture, paragraph 606 HEXP-3, while there was no practical affordable medical access, to the biochemical and coercive psychological operations from Kirkland, WA, paragraph 604 HEXP-2, leading to another suicide ideation), including neurological examinations, which disclose no known injury or disability which would lead to loss of balance or mental reasoning ability, except by the purposeful biochemical hijackings of brain chemistry by the illegal and internationally prohibited BRMT bioweapon and bioweapon delivery system.

D. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate

frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	Facts - Subcount Series	Subcount(s)
	NSEC National Security Pretexting and Entanglements	
604-606, 620	HEXP Illegal Human Experimentation	1-3, 17
	RGTS Individual Rights Violations and Conspiracies	
	RICO Racketeering	
694-710	LTHL Lethality Attempts	1-17

805. CLAIMS FOR RELIEF – COUNT 5

Violations of Constitutional Rights Under the First, Fourth, Eighth, Thirteenth, Fourteenth Amendments

Conspiracy to Murder

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. §§ 175, 1117, 1961-1968, 1981
Washington:	RCW § 9A.28.040(1)
New Jersey:	NJ Rev Stat §§ 2C:5-2, 2C:11-3, 2C:41-1 through 2C:41-6, 10:6-2
New York:	New York Penal L. §§ 105.15; 125.27(a)(v), 460.00 through 460.80, 490.25
California:	Cal. Penal Code §§ 182(a)(1), 187(a)
Massachusetts:	NA
Arizona:	NA
Texas:	NA
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph.

B. Defendants have and do plan, conspire, perpetrate and engage in their series of conspiracies to cause and create injury and death to these plaintiffs as specifically cited and described at all subparagraphs in this paragraph, both within and without the territory of these

states, and of the United States. These conspiracies include, without limitation and subject to discovery, the extreme traumas and deaths during illegal human experimentation on Lead Plaintiff and other immediate and extended family members in the development of the illegal BRMT bioweapon and bioweapon delivery system in:

(i) the medically prescribed aspirin/codeine overdose death of Sandra Darlene Brewer (age 11) of Reye Syndrome in April 1970, at the hand of a certain embedded federal medical doctor KOHLER (paragraphs 99d, 417, 418, 714, 740, 803C-D, 805B(i), H, S, BS, 806B, 814B), then practicing medicine in Federal Way, WA;

(ii) the death of Audrey Brewer (age 18) in September 2011 at the hand of an armed perpetrator manipulated by psychological coercion and by the illegal BRMT bioweapon and bioweapon delivery system brain hijacking described herein, and

(iii) the attempts on the Lead Plaintiff's life and other innocent lives described at paragraphs 694-710 LETHL-1 through LETHL-17 and Interline Exhibit 15.

C. These conspiracies to commit violent acts in pursuit of deadly outcomes against these three members of an extended family of the descendants of Earl Brewer, Cashmere, WA, and his father William John Brewer, a Civil War recipient of the Medal of Honor as a conscientious objector, were and are integral elements of religious discrimination used by defendant UNITED STATES which illegally selected these US persons for direct persecution in its illegal pursuit of the prohibited BRMT bioweapon and bioweapon delivery system to pursue its goal of mind control of human subjects, which was a parallel program to the illegal defendant CIA MKUltra program, and which ultimately supplanted and replaced that failed illegal MKUltra program of LSD drugging for mind control.

Lead Plaintiff's Family Of Origin Was Trafficked Into 1970 Family Trauma - Sandra's Death At Age 11

D. Defendant FBI's illegal Cointelpro program and defendant CIA's illegal MKUltra LSD program (which was run in cooperation with defendant ARMY Bioweapons Lab and abused members of its Medical Corps medics) were both well underway in the 1950s during the time when Lead Plaintiff's father Don was drafted into defendant ARMY. He was a religious conscientious objector and served as a medical corpsman at Fort Lewis, WA during the Korean War era. A few years after leaving defendant ARMY, Lead Plaintiff's unwitting father Don was employed and surreptitiously human trafficked in 1961 by an illicit defendant FBI cover company, Pacific Paper Products, Tacoma, Washington to northern California in 1961 and southern California in 1962. Ostensibly employed there as a medical products sales representative targeting health care practices and facilities, he sold disposable paper examination room table covers and surgical paper drapes for operating tables.

E. Lead Plaintiff's father Don was first employed in northern California for a year, then moved to southern California for a second year, to follow a built list of specific sales leads at medical treatment facilities – clinics and hospitals - which the cover company provided. By using federal funds to subsidize the medical paper products company operations, this defendant FBI cover company undercut private competitors' prices to gain market access to specific medical facilities targeted by defendant FBI. Lead Plaintiff's father Don was offered a commission bonus for securing and recycling x-ray films from these same health care practices and facilities. With a young family of five from low cost Washington living in far more expensive California, he pursued this added commission income for medical x-ray films recycling.

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

the United States. Defendant FBI's Cointelpro operations included violent acts by FBI agents, other police powers, informants, and by violent criminal militias funded by FBI between 1956 and 1971. Offered a third year of employment if he moved to Texas to continue sales work and secret evidence destruction program he was unwittingly performing for defendant FBI, he declined to move his family again year after year and returned to Washington state in 1963.

G. On his return to Washington state, Lead Plaintiff's father Don was befriended, surveilled, and manipulated by defendant undercover FBI embedded agent Earl Keller, posing as a fuel oil salesman at Smith Brothers Dairy in Kent, WA where Don worked as a route delivery driver and then as owner of a Des Moines, WA area dairy products delivery route purchased from Alan Fisher, between 1963 into the 1970s.

Reye Syndrome Death Of Sandra, Age 11 Was Directly Caused Or Dramatically Accelerated By Defendant United States' Embedded Physician Kohler

H. Lead Plaintiff was age 14 on January 1, 1970. His family of origin experienced a series of extreme emotional experiences during 1970 as his brother was born in January (echoing the 15 year difference in ages between his father Don and uncle Bruce), his sister Sandra died from Reye Syndrome. Reye Syndrome is triggers extremely rapid brain and liver swelling first described in The Lancet, British medical journal in a 1963 article describing Reye Syndrome at https://www.sciencedirect.com/getaccess/pii/S0140673663905543/purchase. Sandra's death was caused family doctor KOHLER (paragraphs 99d, 417, 418, 714, 740, 803C-D, 805B(i), H, S, BS, 806B, 814B), who prescribed an extreme dose of aspirin (the cause of Reye Syndrome) which was masked by opiate pain-killer codeine in the same prescription while she was experiencing influenza in April 1970. This prescription and its strength magnified the adverse medical effects of Reye Syndrome's extreme rapidity of salicyclate (aspirin) damage to the brain and liver by masking the pain (with codeine, an opiate) from Sandra for a time, which depressed the

symptoms and functionally greatly increased the chances she would die from Reye Syndrome. She died within 24 hours of receiving this fatal prescribed overdose of salicylates (aspirin) with the pain of Reye Syndrome brain swelling partially masked by codeine (an opiate), as described:

Salicylates Toxicity (emphasis added):

> "In an acute salicylate overdose, the onset of symptoms will occur within 3 to 8 hours. The severity of symptoms is dependent on the amount ingested. For mild ingestions (salicylate levels 40 to 80 mg/dL) nausea, vomiting, and generalized abdominal pain are common. Tachypnea (rapid, shallow breathing) is usually present. Headaches and dizziness may also occur. The classic finding of tinnitus may also be present. However, this can occur at lower, non-toxic levels.
>
> Patients with moderate salicylate toxicity (80 to 100 mg/dL) will experience more severe neurological symptoms. These can include confusion, slurred speech, and hallucinations. Tachypnea is more pronounced and is accompanied by tachycardia and orthostatic hypotension (lightheadedness). Expect these symptoms 6 to 18 hours after ingestion.
>
> Salicylate levels greater than 100 mg/dL are considered severe toxicity and occur 12 to 24 hours after ingestion. Damage to the basement membranes will cause cerebral and pulmonary edema (brain swelling and fluid accumulation). Patients may become obtunded and develop seizures. Hypoventilation may replace hyperventilation, which is concerning for impending respiratory failure. Endotracheal intubation, while not ideal for the metabolic disorders, may be necessary for airway protection. Hypotension due to acidosis and hypovolemia is possible. Cardiac dysrhythmias may occur. Sinus tachycardia is the most common. Cardiac arrest may also occur with asystole being the most common rhythm."

Source: https://www.ncbi.nlm.nih.gov/books/NBK499879/

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ORIGINAL ARTICLES

ENCEPHALOPATHY AND FATTY DEGENERATION OF THE VISCERA A DISEASE ENTITY IN CHILDHOOD

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Graeme Morgan M.R.A.C.P. (CHIEF RESIDENT MEDICAL OFFICER) [2],
J. Baral M.B. Sydney (RESIDENT PATHOLOGIST) [1]

I. Sandra's condition around 3PM the afternoon before her death indicated extreme head pain from swelling and fluid accumulation within the skull to the then 14 year old Lead Plaintiff. While Lead Plaintiff was present in her bedroom for about ten minutes trying to comfort her, she sat up and rocked back to the fully reclining position in her bed repeatedly as she cried out in pain, holding both hands to her head. She was transported to Mary Bridge Children's hospital in Tacoma, WA by ambulance around 4:30PM and died early the following morning.

Family Is Abrupt Trafficking To Fraudulent Home Churches And Congregants In Kent, WA And Northeast Tacoma, WA

J. Around June 1970, within 4-8 weeks after Sandra's death, the family was told to move from the home church they had attended in Convington, WA, since their Summer 1963 return from California. This transfer to a different home-based church congregation of total strangers in this tight knit community was communicated to the Lead Plaintiff's father Don by church ministers who traveled among these home meeting places in their assigned territories (called workers in this church). There was no particular reason given by the workers for moving them

away from the comfort of the familiar fellowship within weeks after Sandra's death into another home-based church congregation (typically 16-20 people in 3-5 families).

K. The family was transferred to the home church congregation of elder "Snow." (Stephen BREYER) on about 40 acres in Kent, WA, who then hosted these Sunday home religious services from mid-1970, a few weeks after the death of Lead Plaintiff's sister Sandra from Reye Syndrome at age 11 until around 1972. This transfer required defendant UNITED STATES to infiltrate this church in this particular area of King County, WA, either while posing as workers (whose territories are assigned by more senior worker leaders) or for the illicit purpose of directly influencing those senior workers who directed the church workers to make this reassignment to a group of strangers hosted by Snow (BREYER).

L. This new group met in a home in Kent, WA, within five to seven miles of the original Covington, WA area home church. This directed transfer brought the family into contact with complete strangers they did not know. This was very unusual in this small, tight-knit community where the family had lived among fellow worshippers, relatives, and friends in this church community of friends in the Enumclaw-Kent-Federal Way area of southern King County, WA since both parents had been children, except for the two years spent in California between Summer 1961 and Summer 1963. Church members were well acquainted with friends from other church gatherings in the region. The church held weekly gospel meetings in rented community halls attended by dozens of friends from different home churches every Sunday night most of the year, held annual special meetings of hundreds of friends, and gathered thousands of friends gathered in a series of annual conventions held in various regions of different states, which featured four days of three per day meetings with workers and friends who traveled from other areas of the state and country to preach and to attend, so there was little reason they would not have known these congregants as friends.

M. Soon after this reassignment to the Snow (defendant BREYER) home church, the family was hosted for an after-meeting Sunday afternoon dinner, where they were fed a meat product as the main course. After the dinner, the male head of that family told Lead Plaintiff's father Don they had just had horsemeat for that Sunday dinner, likely believing it would provoke an angry reaction from his father Don . It was well known that Lead Plaintiff's father Don loved horses from his first ownership of them as a teenager, and then had a number of horses at the family's Federal Way home, beginning about 1966. This demonstrates the clear malice and complete lack of understanding of the ethic and culture of people in this religion by these federal agents, most probably defendant FBI in this particular scenario. The Lead Plaintiff father Don's emotional reaction was thoughtful, as he verbally compared the taste and texture of the meat to other meats, not even slightly angry, and based in the naïve belief that these people were actually friends in this tight-knit high trust community of fellow worshippers. This family and the small handful of other families in the faked Snow (BREYER) home church congregation were undercover personnel of defendant UNITED STATES (ARMY, CIA, FBI, USMS) deliberately assigned in support of the illegal BRMT bioweapon and bioweapon delivery system development program while masquerading as fellow worshippers.

N. The Lead Plaintiff's family attended this Snow (defendant BREYER) congregation for about two years before being moved again to another congregation near Des Moines, WA, where Lead Plaintiff would attend his last Sunday services as a teen, before he reluctantly parted from this Quaker-based church he had grown up in since birth.

O. After Sandra's death, the Lead Plaintiff's family was also removed about the same time in 1970 from the Wednesday night bible study at the Hansen residence in Edgewood, WA, a few miles south of their Federal Way, WA to a home Bible study meeting in northeast Tacoma. (Sandra's surviving twin sister married a member of that same Hansen family years later.) While

attending this unfamiliar northeast Tacoma home church one Wednesday night around June 1970, Lead Plaintiff's 4-6 month old brother was teething and fussing during one of those Wednesday night bible study meetings. He was offered a small thin glass two sphere bubble-shaped hourglass filled with an orange fluid, which used hand temperature on one sphere to bubble the orange liquid into the other sphere. This object was accepted, and he bit down on one sphere, which broke in his mouth. The broken glass was quickly cleared from his mouth, and he was rushed by Lead Plaintiff's parents to Mary Bridge Children's Hospital, where he was placed in the same room where Sandra had died about 2-3 months earlier. He survived this trauma.

P. Both Lead Plaintiff's paternal great-grandparents then died in their 90s within 6-8 weeks of one another in Summer 1970.

Q. The Lead Plaintiff's family was systematically and programmatically traumatized by this series of extreme psychological impact events within the first seven months of 1970, and by their removal from their natural religious support groups in the two church congregations to fraudulent meetings comprised of complete strangers who appeared to share their faith (actually defendant UNITED STATES personnel carefully positioned in advance of these traumas and posing as church members) who displayed micro-aggressive psychological behaviors including, without limitation, the horsemeat incident related at paragraph 805M above. These behaviors supported illegal medical research on the Lead Plaintiff's family which began in the 1950s as Lead Plaintiff's father Don served honorably in defendant ARMY Medical Corps, and continues into the present across four generation of this extended family and religion, all by systematically abusing religious and other freedoms using the illegal BRMT bioweapon and bioweapon delivery system, rights violations, and racketeering acts by defendant UNITED STATES and its co-conspirators, descendants of Quaker defendant ARMY Medal of Honor winner who helped free slaves and reunite the United States of America between 1861-1865.

R. To accomplish this 1970 church transfer required elaborate pre-planning to (i) penetrate the church sufficiently to create the reassignment after Sandra's death, to (ii) acquire a location in the immediate area of the existing home-based church locations where the Lead Plaintiff's family participated for the fraudulent church meetings which was sufficiently separate from others nearby residences to avoid notice, and (iii) study the religion sufficiently to understand its organization structure, customary forms and manners of worship practices, and customary modes of speaking, (iv) and to select and train the assigned fraudulent congregants ("friends" as known in various Quaker religious groups). These activities would require several years of research to establish the totality of the church pattern of customary practices, including attendance at services over an extended period of time, at least one year is required to directly experience the entire annual cycle of worship.

S. Defendant UNITED STATES, and individual government personnel including, without limitation, defendant BREYER and unknown others, acted in violation of the constitutional rights found in the Establishment Clause and case law which prevailed at the time and has been renewed by Congress in 42 U.S.C. §§ 2000bb-2000bb-4, and conspired to engage in this deliberate human traumatization of an extended American family, for the criminal purpose of developing an illegal weapons system using illegal human medical experimentation on US persons, to and including conspiring to orchestrate the death of Sandra Darlene Brewer at age 11 from a medical cause. This cause was described in British medical journal The Lancet in 1963 and known to cause and create deadly outcomes (murder). This murder was surreptitiously concealed as a medical cure administered by community-embedded physician KOHLER (paragraphs 99d, 417, 418, 714, 740, 803C-D, 805B(i), H, S, BS, 806B, 814B), and further concealed by color of law abuse of state secret privilege in violation of 5 U.S.C. § 22 (now amended as 5 U.S.C. § 301, paragraph 260) and *United States v. Reynolds*, 345 U.S. 1 (1953).

T. In 1970, the year Sandra died, Congress adopted and President Nixon signed the Racketeering Influenced and Corrupt Organizations Act, 18 U.S.C. §§ 1961-1968 to combat organized crime. Defendant FBI's Cointelpro was discovered by a citizen burglary in 1971, CIA's secret LSD drug program MKUltra was first publicly disclosed in 1973. No criminal prosecutions resulted from either of those decades of criminal racketeering acts by defendants FBI and CIA. The pattern of racketeering acts conducted by an associated-in-fact enterprise in defendants' actual field operations as directly experienced by Lead Plaintiff (the majority of the content of this complaint) then did, and still does, match the statutory definitions at 18 U.S.C. § 1961.

U. In 2018, Lead Plaintiff was trafficked to a location 550 feet from two co-indicted conspirators in the New Jersey Senator Menendez national security investigation. In July through November, he was subjected to an indirect verbal threat and three direct instances of violence (Interline Exhibit 15) which could have caused death and did result in direct injury using the illegal BRMT bioweapon and bioweapon delivery system in a situation requiring a conspiracy to orchestrate (Interline Exhibit 15C). While the technology has been updated, the pattern of racketeering acts has not significantly changed. The shoe fit in 1970, it still fits.

Lead Plaintiff's Own 1968 Involuntary Servitude And Trafficking At Age 12 Had Preceded 1970 Family Traumas

V. Lead Plaintiff was first directly human trafficked in 1968 at age 12 by a former defendant ARMY Medical Corps "buddy" of his father, Gary JACK, for an illegal biomedical experiment on him during a camping trip by an ARMY or CIA bioweapons team abusing Lead Plaintiff's oxytocin hormones by using a battery powered close proximity remote device to activate oxytocin (love) hormones in a California State Park tent camping site near Redwood National Park (paragraph 3).

W. As 14 year old Lead Plaintiff attended the second semester of ninth grade at Lakota Junior High School in 1970, majority age undercover intelligence agent Lani FISH (paragraphs 415, 417B, 803AW, FBI) posed as a fellow student, played french horn in the Lakota Junior High School band alongside Lead Plaintiff, and attended some of the same classes, including a class taught by Suss, recollected as a math teacher. Suss indirectly called out Lead Plaintiff in front of the class for a junior high school romantic crush 3 or 4 page love letter written at home which Lead Plaintiff had handed to FISH (who later reappeared Dorothy FULLER in the early 1980s, paragraph 415, 417B, 803AW). This was perpetrated by placing a local BRMT hormone manipulation device in the Lead Plaintiff's home to get the required oxytocin (love) hormone boost as he wrote the junior high crush letter. A bedroom nightstand tube AM radio is the most probable source of the specific radio frequency emissions used by defendant CIA or ARMY to abnormally stimulate the posterior pituitary gland to secrete additional oxytocin (love hormone). According to the Cleveland Clinic: "Your hypothalamus makes oxytocin, but your posterior pituitary gland stores and releases it into your bloodstream."

X. Lani FISH, as she presented in 1970 during the defendant BREYER management of the BRMT program, was also very probably later known as Dorothy V. FULLER, paragraph 610A HEXP-7, while Lead Plaintiff was at Deloitte Seattle in 1979-1986 and during the 1988 transition from spouse Lynne to spouse Jeanette (paragraphs 609, 610) orchestrated by illegal BRMT bioweapon and bioweapon delivery system program manager BURNS and by WATERS.

Y. Doug DANIELSON (paragraphs 417B, 418), a saxophone player in the Lakota Junior High School band, also much older in fact, later appeared to the Lead Plaintiff reporting himself as a medically discharged defendant ARMY Ranger, due to a microwave radar eye injury. This was most probably an early security backcheck in the 1970s used to test the security of these illegal surreptitious operations. Lead Plaintiff has subsequently used his memory of this

infrequently repeated tradecraft security backcheck technique to work backwards through his forensic review in reconstructing the sequence of events and the cover identities of various co-conspirators who worked for defendant UNITED STATES or other police powers and intelligence operations defendants.

Z. Lead Plaintiff moved to tenth grade at Decatur High School in Fall 1970. This public high school was a unique school district spin-out high school formed three years before the building was completed. It met in 1970-71 in the former administration annex adjacent to Federal Way High School, had few teachers and only about 80-90 students, with most classes were conducted by Federal Way High School in the high school building. The other two high schools then graduated about 300-350 students in each graduating class.

AA. Class members beginning in 1970-71 included Shawn Morrissey (Neal K. KATYAL, who posed as a Naval Academy aspirant, either actually defendant DOJ or DOD department or agency, who much later served in defendant DOJ's Solicitor General's office at the same time defendant WEISSMAN was FBI General Counsel to defendant MUELLER) and Thomas Grady (unknown identity, who posed as a West Point aspirant). KATYAL fell from a horse and broke a rib or two while riding bareback as the Lead Plaintiff looked on while giving Morrissey and Grady horse riding lessons around 1970-71 at the Caudle farm which the family rented for horse pasture, around the same time Lead Plaintiff's sister fell from a Shetland pony and struck her temple on a water faucet in the front yard. Both incidents were most probably caused using a sniperscope aimed version of the illegal BRMT bioweapon to aim and disrupt balance and equilibrium which was fired by a camouflaged and concealed individual from a nearby location, causing these falls from horseback.

Illegal BRMT Involuntary Servitude And Human Trafficking Pattern Against Lead Plaintiff And Other Family Members Continued After 1970 Family Traumas

AB. Decatur High School was moved in Fall 1971 to a newly constructed campus at Illahee Junior High School where normal sized classes of students followed the Lead Plaintiff's abnormally small class of 80-90 students. Among the new students who arrived in this larger facility were the Backman "children," Frank and Mariam. Frank, with a receding chin, was in the same graduating class as Lead Plaintiff, and Mariam, a very attractive blond female, presented as a year younger (and in identities at paragraphs 211, 417B, 467, 717, 762 table, 805AC, AK). Mariam's ostensible boyfriend in 1971 was Stuart Bettesworth, who was most plausibly identified in March 2024 as Merrick GARLAND, based upon the morphological comparability of face shape and structure, relative age, and body frame size and shape, as well the distinctive wavy hair. GARLAND definitively reappeared in 1974-76 as Robert Mandich, paragraph 5, 99m, 211, 320, 419, 600G, 803Q, 833F, while still working with defendant BREYER, illegal BRMT bioweapon and bioweapon delivery system program manager. In 1971, Lead Plaintiff was attending the fraudulent cutout home church religious services with his family at the Kent, WA residence used by defendant BREYER while he posed as church elder Snow (paragraphs 21(i), 99M, 211, 417-418), and at the Northeast Tacoma location of Wednesday night bible study, during the two years following his 11 year old sister Sandra's death in April 1970, as related in paragraph 803C-H.

AD. The Backman family's father (or poser) reportedly served as FAA General Counsel in the Pacific Northwest Region office. This Boeing Field, Seattle, WA FAA office, among other duties, supervised Boeing, which manufactured and finished the Boeing 747SP sold to the Kingdom of Saudi Arabia for use by the King in the late 1970s. All Boeing 747s were built in the Everett, WA plant. CNA Industrial Engineering, a captive cover company of defendant UNITED STATES, which later employed the Lead Plaintiff from 1996-2002 while defendant FAUCI posed as its founder, was the principal material handling engineering consultant for the Boeing

Everett 747 manufacturing plant's production equipment design, specification, and installation (paragraph 457, 602H NSEC-3, 841E), as that 98.3 acres under one roof Boeing 747 assembly plant was being built through the 1960's, completed in 1967. The later employment of the Lead Plaintiff at CNA is further evidence of the overall pattern of human trafficking, employment discrimination, and involuntary servitude, and of this durable conspiracy by defendant UNITED STATES departments, agencies, officers, agents, and personnel in systematic violations of constitutional rights and statutes.

AE. In Summer 1972, near Greenwater, WA, defendant UNITED STATES continued its pattern of pretexting Lead Plaintiff in police powers operations, and in intelligence and national security matters, for the purpose of perpetuating and covering up his involuntary servitude as a human subject of its illegal BRMT biomedical human subject experiments, and bioweapon and bioweapon weapon delivery system development, testing, and deployment in the early 1970s. While a high school teenager (at age 16 between his junior and senior years), he and his cousin, Steve Smith, encountered a very well dressed apparent hitchhiker with a briefcase and no vehicle breakdown anywhere in the area to explain his appearance and presence near a forest service logging access road about 5-7 miles south of Greenwater, WA. This male, almost certainly an FBI agent, joined them for a ride to the Greenwater Tavern in Greenwater, WA, then left a classified briefcase satellite phone in the bed of Lead Plaintiff's 1955 Ford pickup truck. The leather briefcase was spotted by Lead Plaintiff in the pickup bed a few miles after the hitchhiker was dropped off, he opened the briefcase out of curiosity, and then safely returned it to that agent at the Greenwater Tavern. With his fingerprints on the handle and locks of the briefcase, Lead Plaintiff had again been deliberately pretexted into a national security matter, as satellite phones would have been classified equipment unknown to the general public in 1972, as nearly everyone had rotary dial landline phones and there were no cell phones.

AF. Lead Plaintiff graduated Decatur High School in 1973 with the small spin-out class of 83-84 graduates where defendant KATYAL and Bettesworth (plausibly identified as GARLAND in March 2024) were present for periods of time, then he elected to attend Green River Community College despite his parent's concern about further education, which was not the family tradition.

AG. From Spring 1972 to Fall 1974, Lead Plaintiff's first job in high school was at an independent grocery store, Larry's Market, serviced by Associated Grocers (WEISSMAN FBI was then illegally embedded at this Seattle wholesale grocery cooperative in the 1970s prior to his illegal embed in the 1980s as General Manager of Puget Consumers Cooperative, where Lead Plaintiff was a Board member and Chair in the 1980s, described at paragraph 425-436). Larry Brewer, cousin of Lead Plaintiff's father Don, was the manager and co-owned the market, supposedly with the produce department manager, but the surreptitious co-owner was defendant FBI, which had embedded its agent posing as a co-owner partner (using defendant FBI funds for the investment) as the produce manager in the grocery store. This defendant FBI agent left several months after the Lead Plaintiff was first employed in 1972, ostensibly due to financial hardship and a medical condition which required kidney dialysis. Fellow employee, Brad, with distinctive red hair and mustache worked as a clerk in Larry's Market, and would reappear in later years in new identities, in the WSU MBA program and for years afterwards in the Pacific Northwest as Mike WORTHY (paragraphs 99k, 418, 422, 493, 726, 762 table, 770, 805AG, AK). His positive identification as an FBI agent came in 2023 through a photograph behind defendant WEISSMAN during a defendant WEISSMAN interview on MSNBC with defendant MELBER wherein red hair Mike WORTHY appears with WEISSMAN, apparently while posing in a Eastern District of New York (Brooklyn) U.S. Attorney group photo.

Family Traumas Continued As Defendant BREYER Perpetuated Pattern Of Involuntary Servitude And Trafficking After 1970

AH. During this same early 1970s period, Lead Plaintiff's father Don was also subjected to illegal BRMT bioweapon oxytocin hormone hijacking. A local BRMT bioweapon device was installed in his route delivery truck, concealed inside the ice cream freezer unit, installed after King County, WA health regulations were changed to require mechanical cooling of dairy products, replacing ice cooling. The illegal BRMT bioweapon unit, hidden in this forward mounted ice cream freezer unit, was activated by an operator stationed in proximity of the delivery truck using a radio frequency remote control.

AI. Defendant UNITED STATES (CIA) housed a single divorced female at the end of his delivery route. Defendant CIA used domestic U.S. brothels elsewhere during this same time period, so this type of operation was not atypical of their operations. The illegal BRMT unit was activated to give an oxytocin (love hormone) boost using a radio frequency remote control to develop and sustain these specific event-driven oxytocin boosts for an uncertain time period, at least four to six months in 1974.

AJ. These cumulative traumas contributed to family marital difficulties over the next few years. These were the same hormone boosts experienced but not understood by Lead Plaintiff at age 12 in 1968, and which he has experienced periodically since that time, paragraphs 608-614. These hormone hijackings support the programmed destruction and fraudulently orchestrations to construct American families, as targeted by defendant UNITED STATES (paragraphs 609-610) and are also used in the programmed destructions of careers and enterprises as it chooses (paragraphs 600-603, 639-693), all of which are practices consistent with those documented by Congress in 1975 related to defendant FBI's illegal Cointelpro and defendant CIA's illegal MKUltra programs and the criminal violations of rights and law documented during those illegal

programs. These are the direct consequences of defendant DOJ's failure to prosecute those felonies and the culture of impunity which continues to prevail as a result of the lack of any meaningful deterrent to federal criminal acts which are institutionally tacitly authorized by defendant UNITED STATES, regardless of Constitution, treaty, and law, all as fraudulently concealed by color of law abuse of state secrets privilege and police powers exemptions, and met with official silence when these criminal acts are reported to defendant DOJ.

AK. The links in this chain of conspiracy have been carefully analyzed and are built on explicit known identifications of individual defendants beginning in September 2023, and on their known patterns of common undercover employment in various defendant UNITED STATES departments and agencies within DOJ, DOD, CIA, and on those individuals' connections with defendant KCSD (defendant REICHERT and close subordinate Boyle, first and second husband of Lynne, who was thereafter married to Lead Plaintiff for a time), Maricopa County Sheriff (ARPAIO), NYPD, state police powers agencies in Washington, Massachusetts, New York and New Jersey, and across the parallel presences of defendants BREYER (Snow), KATYAL (Morrissey, Naval Academy aspirant who resided with School District BD chair explained as ex-Navy veteran), WEISSMAN (at Associated Grocers as self-reported), GARLAND (plausibly as Bettesworth, boyfriend of Mariam Backman in 1971), Brad red mustache at Larry's Market (paragraphs 99k, 418, 422, 493, 726, 762 table, 770, 805AG, AK, later Mike WORTHY at WSU MBA and thereafter, together with defendant FBI produce manager/business partner also at Larry's Market, co-owned by Lead Plaintiff's fathers cousin Larry Brewer, and embedded FBI minder Earl KELLER at Smith Brothers Dairy, which was Lead Plaintiff's father Don's employer and later wholesaler when he owned the route sold to him by Alan Fisher, all beginning in the late 1960s and continuing in the 1970s.

AL. This 1960s-1970s portion of the long-running conspiracy is built upon the definitive links across the extended family of descendants of Earl Brewer (who was the son of William John Brewer, Medal of Honor winner in freeing the slaves in the Civil War) in the family's pursuit of the American dream through higher education, employment, and their entrepreneurship in small businesses, all destroyed by corrupt police powers operations, to and including surreptitious murders.

AM. This pattern of conduct is indicative of the complete surrounding, domination, and subjugation of the family by defendant UNITED STATES in its illegal pursuit of the BRMT bioweapon, which at this stage was a local device controlled by radio frequency remote control, in an associated-in-fact enterprise and conspiracy which could only be accomplished by a conspiracy across multiple defendant UNITED STATES departments, agencies, and personnel with local co-conspirators in this pattern of systematic violations of constitutional rights, federal and state statutes.

Defendant BREYER Perpetuated Pattern Of Involuntary Servitude And Trafficking As Lead Plaintiff Attended College

AN. In Fall 1973, as a freshman at Green River Community College, Lead Plaintiff met and was befriended by Donna Dickover and David Brunton, and by Terry Buckles, ostensibly an employee of the Washington Library Network. From Green River Community College, Lead Plaintiff then transferred to Washington State University in Pullman, WA in Fall 1974. Defendant BREYER had repositioned to Spokane, WA by Fall 1974 while Lead Plaintiff attended Washington State University, Pullman, WA, about 80 miles south of Spokane, WA with Bill Sackville-West, GARLAND (Robert Mandich), and others identified herein at paragraph 419.

AO. Defendant UNITED STATES, primarily CIA, FBI, ARMY, USMS, BREYER, GARLAND, CUNHA, DICKOVER, BRUNTON, William SACKVILLE-WEST, PAGE and NG, continued this manipulation of romantic and intimate interests forward from high school through his undergraduate program at Green River Community College, Auburn, WA in 1973-74 and Washington State University, Pullman, WA in 1974-1977.

AP. Transferring to Washington State University in Fall 1974, Lead Plaintiff entered 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 in 1973 by Dickover and Brunton, who also accompanied Lead Plaintiff to Washington State University, Pullman, Washington in 1974, where he met and developed friendships and/or close personal relationships with defendants Craig PAGE, William SACKVILLE-WEST, other SACKVILLE-WEST family members in Spokane, WA, Robert Mandich (GARLAND), CUNHA, BREYER in Spokane, WA; 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.

AQ. During his first semester, his first assigned roommate Jay Costa was replaced after a few weeks 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 (ARMY), introduced as an AFROTC member working toward medical school admission in psychiatry in the Air Force.

AR. These close college era friends included numerous persons who were in fact government employees of defendants FBI, DOJ, CIA, ARMY including, without limitation, some who may have unwittingly assisted in managing and sustaining the involuntary servitude of

the Lead Plaintiff and others who wittingly to support the secret, illegal development of the internationally prohibited BRMT bioweapon and bioweapon delivery system by defendant CIA (Science and Technology Directorate) and defendant ARMY (Bioweapons Lab).

AS. Lead Plaintiff met Mandich (GARLAND, who had plausibly posed as Stuart Bettesworth at Decatur High School) in defendant WSU Perham Hall residential dormitory in Fall 1974 to Spring 1975 when they resided on the same floor, then both also resided in WSU Nez Perce Village student apartments during the 1975-76 school year. Mandich (GARLAND) drove an older green Mercury Capri compact sedan with extensive door dings which he jokingly accused Lead Plaintiff of causing. Lead Plaintiff opened the door on his 1969 Ford Mustang, which door edge landed on one of the few places where the green paint was still intact and laughed at Mandich (GARLAND). GARLAND was then a subordinate and protégé of defendant BREYER in the illegal BRMT bioweapon and bioweapon delivery system program. GARLAND was dropped from that cover identity at some point, and later "resurrected" out of that cover identity and placed on the DC Appellate Court in 1997 and is now Attorney General since 2021. This federal court appointment occurred after BREYER was elevated in 1994 to the Supreme Court soon after his own "memorial service" at Spokane's downtown Presbyterian Church attended by the Lead Plaintiff alongside the "Sackville-West" family. The unwitting Lead Plaintiff flew back to Seattle from that 1990s memorial service on a first class upgrade, provided by and sitting alongside former CIA director Stansfield Turner, whom he had previously seen at the National Gallery of Art, East Building rotunda in Spring 1979. This connection was made during the identifications sequence subsequent to September 2023.

AT. While he was an undergraduate at defendant WSU, Lead Plaintiff had a close relationship with Bill and with other members of the Sackville-West family, and was a frequent weekend guest in their Spokane home between 1974 and 1977. One Christmas vacation, likely in

1975, Lead Plaintiff stayed at the Sackville-West home for the first several days of Christmas break and arrived at his home in Federal Way, WA in the Sackville-West family's white Chevrolet station wagon to his parent's great relief. He had neglected to tell them he would be coming home a few days late and had been reported missing to the police in Pullman, WA when he did not return at the expected time a few days earlier. In Spring 1976, defendant BREYER asked, and Lead Plaintiff agreed, to haul the foundation pier blocks for the Sackville-West family cabin from Spokane to a site adjacent to the USAF Survival School Range near Cusick and Usk, WA in his blue Ford four wheel drive pickup, and later helped frame the cabin. Lead Plaintiff also rocked infant Anne Sackville-West to sleep as a newborn in David (ostensibly BREYER's son) and Laurie Sackville-West's home in the Spokane area. Laurie (DOLAN) was later Chief of Staff to Washington Governor Gregoire. Lead Plaintiff was a frequent visitor to the Bill Sackville-West home near Manitou Park in Spokane for years afterward into the 1990s, where PAGE, his former college roommate, also lived for a number of years.

AU. Washington Governor Gregoire was supported by DOLAN as chief of staff. DOLAN had posed as daughter-in-law Laurie, married to David, the son of Jack Sackville-West (BREYER), who relocated to Spokane, WA sometime between 1972 and 1974. Gregoire's predecessor was Washington Governor Locke whose administration included Wolfgang OPITZ, a senior level budget agency executive (OFM), who had served as higher education advisor immediately prior to Lead Plaintiff's volunteer work beginning about 1999 at AeA, American Electronics Association, on higher education STEM programs expansion (paragraphs 526, 602H-J NSEC-3, 606C HEXP-3) at colleges and universities in Washington state. OPITZ was plausibly known as Terry BUCKLES, a Washington Library Network employee who Lead Plaintiff knew while at Green River Community College in 1973-74. These relationships

coordinated across federal, state, and local governments under color of law will be further developed through discovery.

AV. Defendants BREYER, GARLAND, CUNHA, BURNS, and unknown other US government employees with the identified cover names in paragraphs 105 table, 226 table, 541 table, LPEE pages 934-1075 as officers, employees, agents, informants, and contractors of defendant UNITED STATES (DOJ, FBI, CIA, ARMY) acted in coordination with defendant WSU (Washington State University), a state chartered and funded land grant university with its own police powers operation, and with defendant WASH state, defendant KCSD and Whitman County Sheriff's Department, city and university police powers agencies to coordinate student housing and teaching assistant office assignments and specified assignment of federal personnel surrounding Lead Plaintiff during Lead Plaintiff's undergraduate and graduate programs, all as described at paragraphs 4(i), 5, 21(i), 48, 99d, 99m, 111, 211, 415, 419, 491-492, 541, 599(i)(a), 600G, 608C, 833F, 840C. All these defendants acted and conspired together, as described at (i) above, in the illegal BRMT bioweapon and bioweapon development program, and in conspiracy with state and local officials identified above.

AW. Lead Plaintiff has experienced these types of illegal operations, conspiracies, and rights violations, as he has been biomedically abused and subjugated by the illegal BRMT bioweapon and bioweapon delivery system which has and does hijack and suppress, without limitation, oxytocin (love), adrenaline (fight or flight), and other mood hormones for decades, beginning in 1968 (age 12, California campground, paragraphs 3, 417, 92), 1970 (Lani FISH love letter, paragraph 415, 417B, 803W), and 1974-1977 (various inaccessible female embedded agents) while he attended defendant WSU (Washington State University), paragraph 415.

AX. This pattern of defendants FBI, ARMY, and CIA abuses of constitutional rights is indicative of the complete surrounding, domination, and subjugation of the family by defendant

UNITED STATES in its illegal pursuit of the BRMT bioweapon which in the 1970s was a local device controlled by an operator or by radio frequency remote control. This pattern of acts, violations, and injuries could only be accomplished by a conspiracy across multiple defendant UNITED STATES departments, agencies, and personnel in systematic violations of constitutional rights and statutes.

Lead Plaintiff's Uncle And His Family Abused Through Involuntary Servitude And Trafficking From 1960s Forward Was Managed By BREYER, BURNS, FAUCI

AY. Defendant BREYER, while employed by the UNITED STATES, most probably continuing his defendant ARMY service or at defendant CIA or DOJ in the late 1960s, directed the illegal BRMT bioweapon and bioweapon delivery system program focused on Lead Plaintiff and on his family of origin, and against other extended family members then residing in the region. Defendant BREYER almost certainly supervised the illegal subjugation and manipulation of Lead Plaintiff's uncle Bruce and family in Walla, Walla and Tri-Cities, WA during the 1970s into the 1980s as uncle Bruce returned to Walla Walla, WA from defendant ARMY Medical Corps service at Fort Hood, TX during the Vietnam War era.

AZ. 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) sometime 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 and weapons grade plutonium production began in the 1950s. Hanford Nuclear Reservation operated until 1965-1987 when 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.

BA. Lead Plaintiff's uncle Bruce was hired by Banner Bank, Bothell, WA in the 1990s where he worked for several years before retiring to Walla Walla, WA. This shadow bank, known herein as Banner Bank Bothell, was hidden under the name of the regional Banner Bank, and used by defendant UNITED STATES to launder the funds which subsidized loss leading cover company operations of CNA Industrial Engineering, where Lead Plaintiff worked from 1996-2002. Defendant FAUCI, posing as founder of CNA, frequently referenced Banner Bank Bothell in his discussions with Lead Plaintiff regarding the funding of CNA operations which employed Lead Plaintiff. These repeated mentions were most probably being used 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. This embedded shadow bank was most probably run by an embedded defendant USMS or USSS personnel who were also known to defendant ROSENBERG (FBI), subject to confirmation through discovery. This overall pattern of fraudulent concealment was uncovered in 2023-24 during the latter stages of the Lead Plaintiff's forensic analysis of tradecraft methods and practices.

BB. Defendant FBI's ROSENBERG, a deep cover illegal embedded agent at NutraSource, Seattle, WA, routinely talked about Walla Walla wine tours in the 1980s and 1990s during his on-going contacts with Lead Plaintiff. Walla Walla is a mid-size city with a slowly growing population averaging 25,000 to 35,000 over the past four decades, and a regional agricultural hub with a private college, Whitman College, and hometown media. The surrounding region began developing a substantial reputation for wine making in the late 1980s and 1990s. Defendant FBI's ROSENBERG was maneuvered into that NutraSource CEO position

out of an illegal FBI Anchorage filed office deep cover position by the illegally embedded FBI agent WEISSMAN as General Manager at PCC. Defendant WEISSMAN had originally formed NutraSource soon after Lead Plaintiff joined the PCC Board, subparagraph 805AG above. and defendant ESTABLISH, Fort Lee, NJ. Defendant ROSENBERG was a principal human trafficker of Lead Plaintiff with defendant CIA's BURNS and defendant NIAID's FAUCI in employment and residential locations from the mid-1980s into the 2000s, while his uncle, Bruce, was employed at Banner Bank Bothell. Bruce retired from Banner Bank Bothell back to his old college town and his wife's hometown Walla Walla, WA, where his son Burt and his wife were raising Audrey, their oldest child, and other grandchildren. Defendant FBI's ROSENBERG, a one hour airline flight away in Seattle, WA, was well positioned to oversee defendant FBI's human trafficking of these extended family members as he did with Lead Plaintiff until he trafficked Lead Plaintiff to the East Coast in late 2005.

BC. This pattern of defendants UNITED STATES, including DOJ, FBI, USMS, ARMY, and CIA, systematic abuses of constitutional rights is indicative of the complete surrounding, domination, and subjugation of the extended family by defendant UNITED STATES in its illegal pursuit of the BRMT bioweapon, which in the 1970s was a local device controlled by an operator or by radio frequency remote control. This pattern of acts, violations, and injuries could only be accomplished by a conspiracy across multiple defendant UNITED STATES departments, agencies, and personnel in systematic violations of constitutional rights and statutes.

Lead Plaintiff's Uncle's Granddaughter Audrey Is Murdered At Age 18 In Defendant CIA's Illegal BRMT Tools of Violence Field Test

BD. Audrey (age 18) was murdered in Walla Walla, WA by a knife slashing of her carotid artery on September 6, 2011, at the hand of an emotionally traumatized and otherwise

completely non-violent female Angela. Audrey, the 18 year old homicide victim of this conspiracy, the daughter of Lead Plaintiff's cousin Burt, and the granddaughter of Lead Plaintiff's uncle Bruce, was born around 1993 and raised in Walla Walla, WA by Lead Plaintiff's cousin Burt and his spouse.

BE. Both Audrey and Angela, the perpetrator, were most probably serially abused with the untraceable illegal BRMT bioweapon and bioweapon delivery system in a defendant CIA field test of tools of violence by defendant CIA to validate the development sequence which they had worked through, during their series of biomedical and coercive psychological abuses of the Lead Plaintiff in 2008-2011 while he was used as an initial test subject for these Tools of Violence, as shown in Tools Of Violence tables A and B below at paragraph 805BH.

BF. Both Audrey and Angela were BRMT brain hijacked both during the series of events preceding the violent incident (by oxytocin – the "love" hormone and adrenaline – "fight or flight" hormone), and then most aggressively during that specific violent homicidal sequence (by adrenaline – the "fight or flight" hormone) in the extreme event which resulted in Audrey's death. This entire sequence was orchestrated by connecting these two victims to the common male "romantic" interest, then by closely observing and manipulating both Audrey and Angela through the misogynistic male who abused both women psychologically and/or physically. The male was the obvious and apparent psychological catalyst for this violent event (paragraph 10, 412, 413, 600B, Interline Exhibit 1) as defendant CIA lurked in the background (operating remotely by video in private and remotely by field operators waiting in public places for the optimum moment to conduct this ultimately lethal field test. This sequence echoes, in a relatively short period of time, the comparable repeated patterns of racketeering conduct which the Lead Plaintiff has experienced over a number of cycles, repeated across decades as related in this

complaint, particularly at paragraphs 604-614, 619 HEXP-1-11, 16; 632-634 RGTS 12-14; 695, 696, 698 LETHL-2,3, 5.

BG. Audrey was murdered using the illegal BRMT bioweapon and bioweapon delivery system. BRMT was used by remote operators operating in proximity of the two women in public spaces, and in supposedly private spaces by secret video monitoring, typically ultra-high resolution fiber optic cameras embedded in electronic devices such as televisions, computers, cell phones, fire detection devices, carbon monoxide alarms, and similar devices which are permanently connected to electricity sources or cable set-top box devices usable as secure virtual private networks. Defendant CIA observed both women over time to illegally use BRMT to biomanipulate hormones (such as oxytocin "love hormone" in the presence of the male) and other aspects of human behavior (pushing particular thoughts and moods on them) to biochemically hijack and abuse both Audrey and her assailant Angela for purpose of orchestrating the relationships, the interpersonal conflict, confrontation, and the violent incident.

BH. This sequence and the violent ultimately homicidal confrontation was used to test and evaluate the modern BRMT bioweapon's effectiveness to perpetrate and sustain violent behaviors. The gross motor muscular control used to manage muscle movement during the fatal longitudinal severing of the carotid artery echoes the pattern of lethality attempts against the Lead Plaintiff including, without limitation, at paragraphs 58(1), 537e, 614 HEXP-11, 700, 701, 708 Lethl-7, 8, 15, and Interline Exhibit 15C. Defendant CIA assassinations are a historical pattern of fact, as is the durable widespread scofflaw behavior of federal police powers and intelligence as related throughout this complaint and in Congressional reports, Presidential Commission reports, and FISA Court reports referenced herein, and in the 1975 Presidential apology for the defendant CIA murder of Frank Olsen in 1953 as defendant CIA's MKUltra was commencing its illegal secret distribution of 100 million doses of LSD into the general US

population. The use of remote, indirect, and non-attributable means in apparently natural creation of violent incidents, are consistent with defendant CIA's historical pattern of practice (paragraphs 359-402). This illegal field test of tools of violence, which tools were constructed over a period of years by defendants CIA and ARMY using illegal human subject medical tests on the Lead Plaintiff below in Table A, was then conducted on his extended family kin, Audrey, as shown in Table B.

<u>Table A - Tools Of Violence:</u> Defendant CIA's Torturous Acts Against Lead Plaintiff (LP) Specifically Incorporated Tools Of Violence Building Blocks Between 2008 And 2011	
A: 1968	Northern California campground 1968: First known oxytocin hormone manipulation at age 12 using a locally operated device
B: 1970s-1990s	King County, Washington 1970s-1990s: BRMT oxytocin and serotonin hormone manipulations from local devices, using locally triggered then remotely triggered by cell phone network by the mid-1980s
C: Late 1990s	Kirkland, WA late 1990s: BRMT balance and consciousness hijacking begin with full body muscle locking rigid statue falls (there is no body crumpling to the ground as normally occurs during fainting)
D: 2003-2005	Kirkland, WA 2003-2005: Coercive psychological operations mask simultaneous brain biochemical torture, which gradually escalates to extreme mental duress and suicide ideation (biochemical imbalance requiring SSRI paroxetine to remedy), a self-inflicted form of violence
E: 2008	Cliffside Park, NJ 2008: On/off BRMT sexual abuse by erectile dysfunction uses central nervous system to block normal specific muscle control
F: 2009-2010	Cliffside Park, NJ 2009-2010: BRMT hijacking for torturous physical cramping and abrupt muscle involuntary movements, long cycle and pulsed short cycle biochemical verbalization and extreme rage events, lead to a full set of emotionally disturbed person symptoms in 2009-2010
G: 2011	Intrusive thoughts and very low intensity adrenaline hijacking to encourage development of a knife use urge while standing near LP's Ramsey, NJ roommate begins in April 2011, and resulted in an Abilify dosage boost later in an attempt to counteract these thoughts. Extensive sexualization of thoughts and behaviors run parallel with sex sting entrapments beginning in 2011

Table B - Tools of Violence: Defendant CIA's 2011 Illegal BRMT Field Test Leads To Audrey's Death			
Comparable LP Illegal BRMT Development Activity Occurrence Shown In Table A Above	**Audrey, age 18**	**Angela, approximately age 30**	**Comparable LP Illegal BRMT Development Activity Occurrence Shown In Table A Above**
		Male contacts Angela first, enters relationship, and psychologically and physically abuses her	A, B: Oxytocin, then adrenaline escalation hijacking, using local monitoring through planted video in private spaces; and using field operators with cell phone type devices in public spaces; both types of operators can activate the remotely located illegal BRMT device from encrypted control devices at their fingertips
A, B: Oxytocin long cycle escalation hijacking	Male contacts second	Angela identifies with male and directs anger at Audrey	A, B: Oxytocin and adrenaline escalation hijacking
B: Oxytocin and adrenaline short-cycle hijackings	Contested contact(s)	Contested contact(s)	B, D: Oxytocin and adrenaline escalation with pulsed short-cycle high intensity hijackings
		Decision to violently confront/jealous rage, impulsively grabs knife for confrontation	D, G: Oxytocin and adrenaline pulsed short-cycle high intensity hijackings, with intrusive thoughts adding knife as the tool of violence
A, D: Oxytocin and adrenaline short cycle extreme hijackings	Male and Audrey together, male encourages confrontation	Enraged confrontation	B, D: Oxytocin and adrenaline escalation with pulsed short-cycle high intensity hijackings
B, D: Local operator triggered short cycle extreme adrenaline hijacking	Knife slashing of carotid artery leads to September 6, 2011 death	Violent contact initiated by a 30 year old female with no history of violent acts at any time (paragraph 803)	B, D, F, G: Oxytocin and adrenaline escalation, muscle control and extreme rage pulsed short-cycle high intensity hijackings, intrusive thoughts to knife use as tool of violence

BI. An additional tragic consequence of this murder and subsequent trauma was the divorce of Audrey's parents, Lead Plaintiff's cousin Burt and his spouse. That trauma was similar to the marital trauma Lead Plaintiff's family nearly suffered about 4 years after Sandra's death. Divorce was and remains extremely rare among members of this very close-knit Quaker-based religious group which has extraordinarily strong traditional family and religious community ties and values.

BJ. Attempts to contact Walla Walla Union-Bulletin to follow up on the specific circumstances of this homicide were obstructed by defendant UNITED STATES on March 20, 2024, so further public records and media reports beyond those at paragraphs 10 and 803 could not be added to the evidentiary record to further develop the context and content of this conspiracy to murder. Discovery is required to further develop this allegation as the illegal BRMT bioweapon and bioweapon delivery system are operated remotely, directly usable to hijack and directly manage human behavior, leave no trace, are illegally concealed behind state secret privilege, and the family connections established herein are extremely strong durable circumstantial evidence of durable adverse contact by defendant UNITED STATES targeting this extended family and their specific Quaker-based religious group across four generations from the early 1950s.

This Specific Progression As A Shared Patterns Echoes Other Documented Patterns Of Practice Of These Defendants

BK. This entire pattern of direct interference by defendant UNITED STATES throughout the course of their lives in the families' movements, employment, businesses, and religion, to and including the abrupt transfers of Lead Plaintiff's family of origin to the fraudulent Snow (defendant BREYER) and northeast Tacoma home church congregations weeks after Sandra's 1970 death are compelling circumstantial evidence of a durable over-arching conspiracy which

led to the deaths of both Sandra in April 1990 and of Audrey in September 2011 (a notably symbolic date). These plaintiffs currently lack the technical and financial resources to develop this portion of the overall conspiracy and the circumstantial connections, but the pattern is quite clear and obvious to the well-practiced eye of the Lead Plaintiff based upon his literal lifetime of unwitting (until around 2021) lived experience in this corrupted undercover and intelligence tradecraft world of associated-in-fact pattern of racketeering acts and rights violations by defendant UNITED STATES and its co-conspirators. Discovery will further substantiate this corrupt pattern of racketeering acts and rights violations by this cross-department, agency, and level of government driven associated-in-fact enterprise.

Other BRMT And Racketeering Pattern Evidence Of Extended Family Illegal Trafficking And Programmed Destruction

BL. The Lead Plaintiff's father Don's cousins, Larry and Linda, located in this same general area of south King County and Pierce County, WA, were also subjected to comparable treatment during this 1960s-1970s period while defendant BREYER was directly present in Lead Plaintiff's family life. Cousin Larry Brewer, who ran and lost Larry's Market to bankruptcy, employed Lead Plaintiff, employed defendant FBI's red hair and mustached Brad last name not recalled but discoverable, and had an alleged financial partner produce department manager whose name is not recalled but discoverable, who were both illegally embedded defendant FBI as defendant WEISSMAN was embedded at its cooperative wholesale grocery supplier, Associated Grocers, and later would report to Lead Plaintiff for three years as Lead Plaintiff joined and then chaired the Puget Consumers Cooperative (PCC) Board of Trustees after Hilde Birnbaum, who chaired the board which Lead Plaintiff joined in the early 1980s, and who was a Nazi tattooed Holocaust survivor of child human medical experiments overseen by Nazi Dachau Concentration Camps Dr. Josef Mengele, similar to those already then being perpetrated since

the 1960s by defendants CIA and ARMY on Lead Plaintiff and his family, who were being secretly manipulated from the 1960s forward by defendant FBI human trafficking and overall control in involuntary servitude to serve the illegal BRMT human medical experiments under field conditions by defendant UNITED STATES (violating our Constitution, 18 USC §§ 175, 241, 242, 1961-1968, and other federal and state statutes as described herein).

BM. Cousin Linda Brewer was diagnosed with schizophrenia and institutionalized in the late 1960s or early 1970s, as was the common practice at the time. Linda later committed suicide in the 1970s or early 1980s after dropping her medication. Lead Plaintiff's own experience has incorporated illegal BRMT biochemical brain hijacking and torture to suicide ideation. There is no other known extended family history or pattern of this form of mental disability or death among this group of family members, descendants of Earl Brewer, Cashmere, WA, son of defendant ARMY's Quaker conscientious objector Medal Of Honor winner, William John Brewer. Private William John Brewer won this Medal Of Honor on April 4, 1865 at the Battle of Appomattox Courthouse, when he rode his horse into the ranks of the confederate Army of Northern Virginia Engineering Company, and stole their Engineer battle flag, as he was concluding his service through the four years of the Civil War as the unarmed company bugler of New York's Second Cavalry Company C, in the last major battle of the Civil War, months before Congress passed and state legislatures ratified the *Thirteenth* Amendment banning slavery and involuntary servitude in December 1865, the very practice used against four subsequent generations of Private Brewer's family from the 1950s through this day.

BN. Lead Plaintiff's stepson Bryce, son of his second wife Jeanette, developed similar metal illness symptoms while in high school, and while being handled by a fellow "student" known to Lead Plaintiff as Donny. Stepson Bryce had to be removed from the 149th Street home after repeatedly refusing medication, multiple assaults on his mother and one on Lead Plaintiff,

medication, and lived on the streets and in a series of shelters and at times in jail, beginning in the late 1990s as his mental illness was not consistently untreated for more than a decade.

BREYER's Deliberate Tradecraft Echoes Directly Inculpate Him By His Own Words And Actions In This Illegal BRMT Conspiracy

BO. Defendant BREYER authored the book Active Liberty in 2005. The book's title echoes the name which Lead Plaintiff gave to a labor scheduling software application in 1983. The ActivLabor software application was developed in 1983 from experience gained at the Westin Hotel Seattle, soon after the Lead Plaintiff was inculpated in that particular national security event, the April 1983 visit of Queen Elizabeth II to Seattle where she remained overnight at the Westin Hotel Seattle.

BP. Sheldon-Lee Associates, a personal partnership, developed this PC-based software application, ActivLabor, using personal funds from the Lead Plaintiff, and as funded through co-worker THORPE at Deloitte Seattle, who most probably used defendant CIA funds authorized by defendant BURNS, not personal funds. THORPE was in the same WSU MBA class as Lead Plaintiff. Lead Plaintiff was inculpated in this particular 1983 Queen Elizaeth II visit national security event by ZOULAS, who was then employed by Westin Corporation at its world headquarters across the street from the hotel. ZOULAS, who was also in the same WSU MBA program graduating class, extended an invitation to Lead Plaintiff to propose consulting services for a profit improvement consulting project at the Seattle Westin hotel. The project was conducted in the immediate aftermath of the Queen's visit. Lead Plaintiff and romantic partner Lynne married and held their reception at this same Westin Hotel May 5, 1984 (paragraph 609 HEXP-6).

BQ. The unwitting Lead Plaintiff had shared an office with a defendant CIA Iranian mercantile class PhD graduate student asset in Fall semester 1978 which ended in January 1979

just as the Shah of Iran left the Peacock Throne in Iran and Ayatollah Khomeini returned to Iran in triumph, replacing the widely-hated Shah and his Savak secret police. Lead Plaintiff was them moved to shared offices in Todd Hall (now Carson Hall) with THORPE and shared classes with both THORPE and ZOULAS at WSU, as defendant BREYER continued oversight of illegal BRMT operations from Spokane, Washington, about 80 miles north of WSU, Pullman, WA, where Lead Plaintiff was a frequent weekend visitor with Jack's (BREYER) son Bill (William Sackville-West) who was also at WSU at the time and in Spokane for many years thereafter.

BR. This PC-based software application, ActivLabor, was then presented to the Westin CFO through ZOULAS, another former WSU MBA classmate who worked in Westin corporate headquarters across the street from the Seattle Westin Hotel CFO. The Westin CFO rejected the ActivLabor software application in late 1983 or early 1984, soon after a software demonstration in a meeting with ZOULAS and THORPE. THORPE transitioned to other projects with Steve Bannon (then known as Tim Easton at Deloitte Seattle) in Micronesia and Central America, then relocated to work on the Saudia Airlines information technology projects in Saudi Arabia with John Blair another Deloitte Seattle defendant CIA asset.

BS. Other defendants conspired with embedded medical doctor KOHLER (paragraphs 99d, 417, 418, 714, 740, 803C-D, 805B(i), H, S, BS, 806B, 814B), BREYER, and with other unknown perpetrators, in the deaths of Sandra and Audrey, for the corrupt and criminal purposes related to the continuous associated-in-fact enterprise pattern of racketeering acts and of rights acts, violations, and injuries, in illegal human subject medical experiments without consent which are prohibited under our Constitution and laws, and in the development, testing, and deployment of the illegal BRMT bioweapon and bioweapon delivery system prohibited at all times since the entry into force of the 1972 Bioweapons Treaty on March 26, 1975. These conspiracies, acts, violations, and injuries, from at least 1968 forward, led to and through the

deaths of Sandra in 1970 and Audrey in 2011, and are integral elements of, and are directly related to those conspiracies to inflict death. The identities of those other institutional and individual defendants are subject to discovery against these defendants, in particular defendants UNITED STATES, FBI, ARMY, CIA, NIAID, and other unknown departments and agencies therein.

Congress Extended Individual Liability To Federal Officials For Constitutional and Color Of Law Acts, Violations, And Injuries

BT. As more fully discussed at paragraphs 250-346, Congress extended liability for these acts, including conspiracies to act, beyond the institutional defendants herein under 42 U.S.C. §§ 1983, 1986 and 18 U.S.C. §§ 1961-1968 to all current and former government individual defendants herein while acting outside the scope of their official capacity, whether or not they were acting under color of law:

> ".....when Congress amended FTCA in 1974 to create a cause of action against the United States for intentional torts committed by federal law enforcement officers, 28 U.S.C. § 2680(h), the congressional comments accompanying that amendment made it crystal clear that Congress views FTCA and Bivens as parallel, complementary causes of action:" *Carlson v. Green,* 446 U. S. 14, 18-20 (1980)

28 U.S.C. § 2679(b)(2) removes the exclusiveness of the federal tort claims remedy as follows:

> "(2) Paragraph (1) does not extend or apply to a civil action against an employee of the Government—
>
> (A) which is brought for a violation of the Constitution of the United States, or
>
> (B) which is brought for a violation of a statute of the United States under which such action against an individual is otherwise authorized."

BU. Such a cause of action had also existed for injuries which were the result of intentional discrimination against religion in violation of the Establishment Clause prior to 1970, as Congress made clear when enacting the Religious Freedom Restoration Act in 1993:

> "2000-bb (b) PURPOSES The purposes of this chapter are—

(1) to restore the compelling interest test as set forth in Sherbert v. Verner, 374 U.S. 398 (1963) and Wisconsin v. Yoder, 406 U.S. 205 (1972) and to guarantee its application in all cases where free exercise of religion is substantially burdened; and

(2) to provide a claim or defense to persons whose religious exercise is substantially burdened by government."

"2000bb-1(c) JUDICIAL RELIEF

A person whose religious exercise has been burdened in violation of this section may assert that violation as a claim or defense in a judicial proceeding and obtain appropriate relief against a government."

In *Butz v. Economou,* 438 U. S. 478 (1978):

"Federal officials should enjoy no greater zone of protection when they violate federal constitutional rules than do state officers."

BV. The targeting of plaintiffs in this class for criminal violations of rights and law including, without limitation 18 U.S.C. § 175 prohibiting the illegal BRMT bioweapon and bioweapon delivery system development, testing, and deployment, is the direct result of religious discrimination by defendant UNITED STATES against them and their forebears, as set forth above in this paragraph and at paragraphs 1, 403-418. *Bivens* constitutional rights claims (paragraphs 91, 277-285, 288-296) are also valid for these constitutional claims of conspiracy against these individual defendants since (i) no special relationship existed with any plaintiff at the times and places of these defendants' conspiracies to violate plaintiffs' Constitutional and statutory rights, (ii) no other remedy has been enacted beyond those set forth within the four corners of this complaint, and (iii) all pleas and petitions to the federal executive have been met by official silence (paragraphs 25, 29, 37, 580-592, Interline Exhibit 15E) which has and does accompany defendants' coordinated fraudulent concealment (paragraphs 550-592, Interline Exhibits 17-19, LPEE pages 368-793, 795-796, 11630-11936, particularly 508-541). Color of law claims at paragraph 845 against both named and as yet unknown defendants, who are the

subjects of discovery against named defendants, are also incorporated herein by reference in these conspiracies to murder and/or manslaughter of Sandra in 1970 and Audrey in 2011.

BW. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	**Facts - Subcount Series**	**Subcount(s)**
	NSEC National Security Pretexting and Entanglements	
604-607	HEXP Illegal Human Experimentation	1-4, 17
	RGTS Individual Rights Violations and Conspiracies	
	RICO Racketeering	
694-710	LTHL Lethality Attempts	1-17

806. CLAIMS FOR RELIEF - COUNT 6

Violations of Constitutional Rights Under the Fourth, Fifth, Eighth, Fourteenth Amendments

Manslaughter

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. §§ 175, 1112, 1119, 1961-1968, 1981
Washington:	RCW § 9A.32.060
New Jersey:	NA
New York:	NA
California:	NA
Massachusetts:	NA
Arizona:	NA
Texas:	NA
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph.

B. Defendants have and do plan, conspire, perpetrate and engage in, as the proximate cause, among other acts, injuries, and violations at the final subparagraph in this paragraph, which occurred both within and without the territory of the United States, for the purpose of inflicting extreme trauma during the illegal human experimentation on Lead Plaintiff and other family members in the development of BRMT, of the prescribed aspirin/codeine dosed death of Sandra Darlene Brewer (age 11) during an episode of influenza in April 1975, at the hand of a certain medical doctor KOHLER (paragraphs 99d, 417, 418, 714, 740, 803C-D, 805B(i), H, S, BS, 806B, 814B), then practicing medicine in Federal Way, WA, where Lead Plaintiff lived with his family of origin (age 14). See paragraphs 99d, 211, 417-418, 803. This further incorporates the death of Audrey Brewer in September 2011, at the hand of an emotionally traumatized and otherwise completely non-violent person through the direct abuse of apparent perpetrator and

victim abused by the illegal BRMT bioweapon and bioweapon delivery system preceding and during that violent homicide in Walla Walla, WA (paragraph 10, 412, 413, 600B, 803, Interline Exhibit 1). These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs.

C. Defendants have and do act, in their series of conspiracies and attempts to defraud, entrap, incriminate, discredit, disable, and/or destroy the Lead Plaintiff, as particularly cited and described in each subcount in the table at the next subparagraph below, both within and without the territory of these states and of the United States. This long-running, comprehensive, and systematic pattern of associated-in-fact enterprise racketeering acts has and does sustain the fraudulent concealment of (i) the illegal BRMT bioweapon and bioweapon delivery system, of (iii) the associated-in-fact illegal enterprise itself, of (iii) continuing obstructions of justice both by acts and by willful blindness, and (iv) perpetuate the destruction of evidence of prior criminal acts, and of acts, injuries, and violations of constitutional rights, Privileges and Immunities, statutes, and common law by these defendants, all directed without legal cause under color of law at these specifically targeted persons.

D. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of

whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	Facts - Subcount Series	Subcount(s)
	NSEC National Security Pretexting and Entanglements	
604-607, 620	HEXP Illegal Human Experimentation	1-4, 17
	RGTS Individual Rights Violations and Conspiracies	
	RICO Racketeering	
694-710	LTHL Lethality Attempts	1-17

807. CLAIMS FOR RELIEF - COUNT 7

Violations of Constitutional Rights Under the First, Fourth, Eighth, Thirteenth, Fourteenth Amendments

Attempted Manslaughter

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. §§ 175, 1113, 1119, 1961-1968, 1981, 2332b
Washington:	RCW § 9A.28.020
New Jersey:	NJ Rev Stat §§ 2C:5-1, 2C:11-4, 2C:41-1 through 2C:41-6, 10:6-2
New York:	New York Penal L. §§ 110, 125.20, 460.00 through 460.80, 490.25
California:	Cal. Penal Code §§ 192(a)/664
Massachusetts:	NA
Arizona:	NA
Texas:	NA
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Paragraph 803 subparagraphs E through Y are specifically incorporated by reference

to avoid their repetition in this paragraph. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph.

B. Defendants have and do plan, conspire, perpetrate and engage in their series of attempts to cause and create injury and death to the Lead Plaintiff as specifically cited and described at subparagraph E below, both within and without the territory of these states and of the United States.

C. Defendants have and do act, in their series of conspiracies and attempts to defraud, entrap, incriminate, discredit, disable, and/or destroy the Lead Plaintiff, among other acts, injuries, and violations at the final subparagraph in this paragraph, both within and without the territory of these states and of the United States. This long-running, comprehensive, and systematic pattern of associated-in-fact enterprise racketeering acts has and does sustain the fraudulent concealment of (i) the illegal BRMT bioweapon and bioweapon delivery system, of (iii) the associated-in-fact illegal enterprise itself, of (iii) continuing obstructions of justice both by acts and by willful blindness, and (iv) perpetuate the destruction of evidence of prior criminal acts, and of acts, injuries, and violations of constitutional, common law, and statutory Privileges and Immunities, by these defendants, all directed without legal cause under color of law at these specifically targeted persons. Discovery will provide further specific evidence relevant to each noted incident and more incidents of such acts, both survived by the targeted persons and likely not survived, to members of this class of plaintiffs. These acts, violations, and injuries are representative of those perpetrated by these defendants on this class of plaintiffs.

D. Lead Plaintiff is an active person who regularly engages in exercise, has an excellent sense of balance, and a demonstrated history of sports and other activities which have not, on their own, led to any loss of balance. Lead Plaintiff is an extremely emotionally stable person not

prone to panic, phobias, or irrational thoughts or thought processes, with strong and deep analytical professional education, training, and experience. See paragraphs 320e, LPEE pages 190-236. Lead Plaintiff has and does have regular medical examinations and tests, including neurological examinations, which disclose no known injury or disability which would lead to loss of balance or mental reasoning ability absent the purposeful external hijackings of the illegal and internationally prohibited BRMT bioweapon and bioweapon delivery system.

E. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	Facts - Subcount Series	Subcount(s)
	NSEC National Security Pretexting and Entanglements	
604-606, 620	HEXP Illegal Human Experimentation	1-3, 17
	RGTS Individual Rights Violations and Conspiracies	
	RICO Racketeering	
694-710	LTHL Lethality Attempts	1-17

808. CLAIMS FOR RELIEF – COUNT 8

Violations of Constitutional Rights Under the First, Fourth, Fifth, Eighth, Ninth, Thirteenth, Fourteenth Amendments

Kidnapping

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. §§ 1590, 1961-1968
Washington:	NA
New Jersey:	NJ Rev Stat §§ 2C:13-1, 2C:41-1 through 2C:41-6, 10:6-2
New York:	NA
California:	NA
Massachusetts:	NA
Arizona:	NA
Texas:	NA
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph.

B. Defendants have and do plan, conspire, perpetrate and engage in obstructions of justice through the illegal color of law use of the laws of the State of New Jersey to kidnap and suppress the rights of the Lead Plaintiff and to obstruct justice. 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 on the acts, violations, and injuries, and has been able to develop since the September 2023 personal identifications of individual federal officials which definitively linked these individual federal defendants to their federal departments and agencies for definitive identifications of the perpetrators and which thereby served to highlight the full scope of events, the related institutional defendants' operational tradecraft signatures, and to facilitate specific positive identifications of additional individual defendants who clearly linked specific institutional defendants to specific acts, violations, and injuries.

C. The June 2010 federal court filing was swiftly followed in July 2010 by a certified letter from Lead Plaintiff's 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.

D. CHALOM knocked at his apartment door on September 1, 2010 demanding he leave the premises. He overstayed his rental period to remain in renovated Cliffside Park, NJ (renovated by his hand and his funds never fully compensated by CHALOM, paragraph 642 RICO-4) until October 1, 2010 when, with no financial resources or credit, he became homeless again. Duress as a preferred method of fraudulent concealment was hereby being reintroduced yet again by defendant UNITED STATES, with co-conspirators NJSP, BERGEN COUNTY, and BERGEN SHERIFF, as related below.

E. 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.

F. 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.

G. 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 Revised Statute 30:4-27 and case law *In Re R.S., 263 N.J. Super.* 428, 432 (App. Div. 1993), are summarized below:

[Intentionally left blank.]

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 any 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 any 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.

H. Lead Plaintiff was informed in a personal meeting with his alleged legal counsel about 5 days later (sometime 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.

J. During this six month confinement period from October 2, 2010 to March 30, 2011, he was (i) transferred among various wards, (ii) experienced a violent indirect threat, (iii) experienced indirect physical violence, (iv) a suicide trauma trigger attempt was perpetrated, (v) had limited access to indoor exercise facilities intermittently and 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.

K. If Lead Plaintiff had been held in criminal confinement upon a conviction by a jury trial, this lack of access to the outdoors would constitute a clear violation of the *Eighth* Amendment prohibition on cruel and unusual punishment. But there was no legal proceeding of any kind, a violation of the *Fifth* Amendment which preceded this sequence of kidnapping and

false imprisonment, all apparently paid for NJ Charity Care, so the *Eighth* Amendment violation must simply be additive to the *Fifth* Amendment violation.

L. Since New Jersey 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, he volunteered to enter a homeless shelter, then when told that was unavailable, "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.

M. 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).

N. 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 January 7, 2001 "voluntary" dismissal of the complaint. The rehousing process began soon thereafter with an "Advance Housing" interview, then two overnight visits to the Ramsey, NJ apartment he would share with a male

roommate, and rehousing was completed on March 31, 2011, with a series of five USMS minders posing as Advance Housing counselors thereafter. This housing had been vacant for several months before he was committed involuntarily to the hospital behavioral health ward on October 3, 2010, according to both his counselor and his new apartment mate in Ramsey, NJ.

O. 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 to the Ramsey, NJ apartment 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 six months after the kidnapping including the imaginary and never held court hearing and order which led to his supposed involuntary commitment, which was actually kidnapping and false imprisonment.

P. Defendants, led by defendant UNITED STATES, in this on-going conspiracy against rights and long-running RICO frauds sequence, once again acted as, and are clearly shown to be, kidnappers and human traffickers of the Lead Plaintiff as their involuntary servant under duress, abusing color of law, and sustaining their illegal abuse of the state secret privilege, among their other violations of rights and law.

Q. 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:

Paragraph(s)	Facts - Subcount Series	Subcount(s)
	NSEC National Security Pretexting and Entanglements	
	HEXP Illegal Human Experimentation	
	RGTS Individual Rights Violations and Conspiracies	
643	RICO Racketeering	5
	LTHL Lethality Attempts	

809. CLAIMS FOR RELIEF - COUNT 9

Violations of Constitutional Rights Under the First, Fourth, Fifth, Eighth, Ninth, Thirteenth, Fourteenth Amendments

<u>Human Trafficking</u>

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. §§ 1590, 1961-1968
Washington:	RCW § 9A.40.100
New Jersey:	NJ Rev Stat §§ 2C:13-8, 2C:41-1 through 2C:41-6, 10:6-2
New York:	New York Penal L. §§ 135.05, 135.35, 135.60, 460.00 through 460.80
California:	Cal Penal Code §§ 236, 236.1(a) Cal Labor Code §§ 2801, 2802 Cal Civil Code §§ 1708-1725
Massachusetts:	Mass Gen L ch 265 § 51
Arizona:	AZ Rev Stat § 13-1308
Texas:	TX Penal Code § 20A.02
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Paragraphs 820C through AA, paragraphs 821C through I, and paragraphs 822C and D are particularly incorporated herein for specific relevance to this paragraph 809. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph.

B. Defendants have and do plan, conspire, perpetrate and engage in, at all times since 1968 (age 12, paragraph 417) in knowing and willful violations while they have and do engage in physical human trafficking to sustain peonage, involuntary servitude, and forced labor in acts, violations, and injuries to Lead Plaintiff and to others similarly situated in at least 44 states and several foreign countries, Canada, United Kingdom, France, and Switzerland, as to Lead Plaintiff alone, as related throughout this complaint.

C. The physical form of human trafficking from 1968 to the present has been conducted together with virtual means of human trafficking, for the specific purposes of (i) deliberately pretexting and entangling Lead Plaintiff without cause in national security matters behind color of law abuse of the state secrets privilege, to (ii) sustain his involuntary servitude and to (iii)

sustain fraudulent concealment for defendants' direct, corrupt, and perpetual benefit. Defendants FBI and CIA have both engaged in virtual human trafficking for this corrupt purpose into other international national security matters under color of law through these and other defendants' fraudulent pretexting, misdirection, and electronic communications interferences in interstate and international commerce as a long-running form of trafficking in many more places around the world. The recently observed forms of these virtual human trafficking acts, violations and injuries include, without limitation:

(i) FBI – using alleged international traders undercover, paragraphs 678 RICO-10; the international operations of Walmart through its subsidiary Walmart (China) paragraphs 475, 478, Interline Exhibit 10; and the international operations of Costco in China and Korea through its Issaquah, WA headquarters, paragraph 478, 679, 680 RICO-41, 42, and as currently blocked from discovery on Lead Plaintiff's own email accounts, paragraphs 515, 565.

(ii) CIA – Ghana, paragraph 637 RGTS-17; China as to Uighur labor exploitation and sourcing, paragraph 680 RICO-42; Russia, paragraph 654B RICO-16 as conducted by the former CIA Moscow station chief who met Lead Plaintiff in Tucson, AZ while posing as an executive of Rabobank in Arizona. Defendant CIA personnel from China and Russia conducted domestic interactions with Lead Plaintiff which were used for their internal security checks and counterintelligence purposes of attempting to identify any adversary intelligence service tracking of those former defendant CIA personnel inside the United States.

Lead Plaintiff's most recent physical human trafficking sequence for these corrupt purposes began in 2018 and continues, by defendant FBI, the US Attorney for the Southern District of New York, and other unknown defendants to be identified, placing him directly into the Senator

Menendez national security investigation which indicted two co-defendants with offices 550 feet from the Lead Plaintiff's trafficked residence which itself is systematically tricked out with electronic devices and surreptitious access used by defendant UNITED STATES in continued illegal surveillance, harassment, and in obstructions of justice through the erasure, deletion, and concealment of evidence, and other systematic violations of rights by these and other as yet unknown defendants, and from which location Lead Plaintiff has been trafficked by these defendants into lethal threats and attempts as related at paragraphs 700, 703-710 LETHL-7, 10-17.

D. The statutory definition of human trafficking, 18 U.S. C. § 1590, has and does identify acts, violation, and injuries to explicitly include "harboring….by any means," which statutory definition is inclusive of both physical and virtual means *(emphasis added)*:

> "(a) *Whoever knowingly recruits, harbors, transports, provides, or obtains by any means, any person for labor or services* in violation of this chapter shall be fined under this title or imprisoned not more than 20 years, or both. If death results from the violation of this section, or if the violation includes kidnapping or an attempt to kidnap, aggravated sexual abuse, or the attempt to commit aggravated sexual abuse, or an attempt to kill, the defendant shall be fined under this title or imprisoned for any term of years or life, or both.
> (b) Whoever obstructs, attempts to obstruct, or in any way interferes with or prevents the enforcement of this section, shall be subject to the penalties under subsection (a)."

E. In the criminal matter *United States v. Costello,* No. 11-2917 (7th Cir. 2012), the Seventh Circuit criticized the government's use of an overly broad definition of harboring which conflated sheltering as harboring, and referred in its opinion to Black's Law Dictionary, which defines harboring as:

> "To receive clandestinely and without lawful authority a person for the purpose of so concealing him that another having a right to the lawful custody of such person shall be deprived of the same. *Jones v. Van Zandt*, 5 How. 215, 227, 12 L. Ed.122. A distinction has been taken, in some decisions, between "harbor" and "conceal." A

person may be convicted of harboring a slave, although he may not have concealed her. *McElhaney v. State*, 24 Ala. 71."

F. Modern Congressional intent regarding the crime of human trafficking, incorporating all these aforementioned statutory elements - recruit, harbor, transport, provide, or obtain by any means, as included at 18 U.S. C. § 1590 - in its findings when that statute was adopted in 2000. This modern Congressional intent is at 22 U.S.C. Chapter 78 - Trafficking Victims Protection. Key elements of relevant Congressional intent and statutory definitions related to human trafficking are excerpted below (emphasis added):

> "22 U.S. Code Chapter 78 - TRAFFICKING VICTIMS PROTECTION
> 22 U.S. Code § 7101 - Purposes and findings
> (a) Purposes
> The purposes of this chapter are to combat trafficking in persons, a contemporary manifestation of slavery whose victims are predominantly women and children, to ensure just and effective punishment of traffickers, and to protect their victims.
> (b) Findings
> Congress finds that:
> (1) As the 21st century begins, the degrading institution of slavery continues throughout the world. Trafficking in persons is a modern form of slavery, and it is the largest manifestation of slavery today……
> (3) Trafficking in persons is not limited to the sex industry. This growing transnational crime also includes forced labor and involves significant violations of labor, public health, and human rights standards worldwide……
> (4) Traffickers primarily target women and girls, who are disproportionately affected by poverty, the lack of access to education, chronic unemployment, discrimination, and the lack of economic opportunities in countries of origin. Traffickers lure ….. children from poor families and sell them into prostitution or into various types of forced or bonded labor.
> (5) Traffickers often transport victims from their home communities to unfamiliar destinations, including foreign countries away from family and friends, religious institutions, and other sources of protection and support, leaving the victims defenseless and vulnerable.
> (6) Victims are often forced through physical violence to engage in sex acts or perform slavery-like labor. Such force includes rape and other forms of sexual abuse, torture, starvation, imprisonment, threats, psychological abuse, and coercion.
> (7) Traffickers often make representations to their victims that physical harm may occur to them or others should the victim escape or attempt to escape. Such

representations can have the same coercive effects on victims as direct threats to inflict such harm.

(8) Trafficking in persons is increasingly perpetrated by organized, sophisticated criminal enterprises..... Trafficking in persons is often aided by official corruption in countries of origin, transit, and destination, thereby threatening the rule of law.

(9) Trafficking includes all the elements of the crime of forcible rape when it involves the involuntary participation of another person in sex acts by means of fraud, force, or coercion.

(10) Trafficking also involves violations of other laws, including labor and immigration codes and laws against kidnapping, slavery, false imprisonment, assault, battery, pandering, fraud, and extortion.

(11) Trafficking exposes victims to serious health risks..... Trafficking victims are sometimes worked or physically brutalized to death.

(12) Trafficking in persons substantially affects interstate and foreign commerce. Trafficking for such purposes as involuntary servitude, peonage, and other forms of forced labor has an impact on the nationwide employment network and labor market. Within the context of slavery, servitude, and labor or services which are obtained or maintained through coercive conduct that amounts to a condition of servitude, victims are subjected to a range of violations.

(13) Involuntary servitude statutes are intended to reach cases in which persons are held in a condition of servitude through nonviolent coercion. In *United States v. Kozminski*, 487 U.S. 931 (1988), the Supreme Court found that section 1584 of title 18, should be narrowly interpreted, absent a definition of involuntary servitude by Congress. As a result, that section was interpreted to criminalize only servitude that is brought about through use or threatened use of physical or legal coercion, and to exclude other conduct that can have the same purpose and effect.

(14) Existing legislation and law enforcement in the United States and other countries are inadequate to deter trafficking and bring traffickers to justice, failing to reflect the gravity of the offenses involved. No comprehensive law exists in the United States that penalizes the range of offenses involved in the trafficking scheme. Instead, even the most brutal instances of trafficking in the sex industry are often punished under laws that also apply to lesser offenses, so that traffickers typically escape deserved punishment.

(15) In the United States, the seriousness of this crime and its components is not reflected in current sentencing guidelines, resulting in weak penalties for convicted traffickers.

(16) In some countries, enforcement against traffickers is also hindered by official indifference, by corruption, and sometimes even by official participation in trafficking.

(17) Existing laws often fail to protect victims of trafficking.....

(18) Additionally, adequate services and facilities do not exist to meet victims' needs regarding health care, housing, education, and legal assistance, which safely reintegrate trafficking victims into their home countries.

(19) Victims of severe forms of trafficking should not be inappropriately incarcerated, fined, or otherwise penalized solely for unlawful acts committed as a direct result of being trafficked, such as using false documents, entering the country without documentation, or working without documentation.

(20) Because victims of trafficking are ..... often subjected to coercion and intimidation including physical detention and debt bondage, and because they often fear retribution and forcible removal....., these victims often find it difficult or impossible to report the crimes committed against them or to assist in the investigation and prosecution of such crimes.

(21) Trafficking of persons is an evil requiring concerted and vigorous action by countries of origin, transit or destination, and by international organizations.

(22) One of the founding documents of the United States, the Declaration of Independence, recognizes the inherent dignity and worth of all people. It states that all men are created equal and that they are endowed by their Creator with certain unalienable rights. The right to be free from slavery and involuntary servitude is among those unalienable rights. Acknowledging this fact, the United States outlawed slavery and involuntary servitude in 1865, recognizing them as evil institutions that must be abolished. Current practices of sexual slavery and trafficking of women and children are similarly abhorrent to the principles upon which the United States was founded.

(23) The United States and the international community agree that trafficking in persons involves grave violations of human rights and is a matter of pressing international concern. The international community has repeatedly condemned slavery and involuntary servitude, violence against women, and other elements of trafficking, through declarations, treaties, and United Nations resolutions and reports, including the Universal Declaration of Human Rights; the 1956 Supplementary Convention on the Abolition of Slavery, the Slave Trade, and Institutions and Practices Similar to Slavery; the 1948 American Declaration on the Rights and Duties of Man; the 1957 Abolition of Forced Labor Convention; the International Covenant on Civil and Political Rights; the Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment; United Nations General Assembly Resolutions 50/167, 51/66, and 52/98; the Final Report of the World Congress against Sexual Exploitation of Children (Stockholm, 1996); the Fourth World Conference on Women (Beijing, 1995); and the 1991 Moscow Document of the Organization for Security and Cooperation in Europe.

(24) Trafficking in persons is a transnational crime with national implications. To deter international trafficking and bring its perpetrators to justice, nations including the United States must recognize that trafficking is a serious offense. This is done by prescribing appropriate punishment, giving priority to the prosecution of trafficking offenses, and protecting rather than punishing the victims of such offenses. The United States must work ..... to engage recalcitrant countries in serious and sustained efforts to eliminate trafficking and protect trafficking victims.

(Pub. L. 106–386, div. A, § 102, Oct. 28, 2000, 114 Stat. 1466.)

22 U.S. Code § 7102 – Definitions.....

(8) Involuntary servitude The term "involuntary servitude" includes a condition of servitude induced by means of— (A) any scheme, plan, or pattern intended to cause a person to believe that, if the person did not enter into or continue in such condition, that person or another person would suffer serious harm or physical restraint; or (B) the abuse or threatened abuse of the legal process.....

(11) Severe forms of trafficking in persons. The term "severe forms of trafficking in persons" means.....(B) the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

G. Defendant UNITED STATES through its various departments and agencies, at times with co-conspirator defendants, and itself at all times has, primarily through defendants DOJ, FBI, CIA, USMS, ARMY, acted in knowing and willful violation of 18 U.S.C. §§ 1590, 1961-1968, by engaging in human trafficking of Lead Plaintiff, including as collateral in his family of origin from age 5 in 1961 (paragraph 414), and directly as the specific subject from age 12 (1968, paragraph 417), to injure Lead Plaintiff in furtherance of these defendants' series of illegal BRMT bioweapon and bioweapon delivery system human subject experimentation, development, and deployment; associated-in-fact pattern of racketeering acts; and illegal schemes, conspiracies, frauds, thefts, and deprivations against him and against these plaintiffs, their rights, families, personal relations and relationships, careers, reputations, property, and business interests, including closely held business entities, and against other US persons in these defendants' illegal spying, surveillance, violence, and property destruction operations against US persons and their property rights and interests, as specifically cited and described in the 110 subcounts and 54 counts (claims) in this complaint, both within and without the territory of these states and of the United States.

H. The sequence of key human trafficking events from 1968 is presented in the entirety of Appendix 1 and at Table 2, found at LPEE pages 12023-12120. Key events in this sequence as

to Lead Plaintiff are recounted at paragraphs 403-584 herein from 1961 to the present time, including initial collateral human trafficking at age 5, direct human trafficking at age 12, career related human trafficking from 1979 through 2005, and subsequent human trafficking in penury in 2005-2007, further fraudulent employment in 2007-2008, and from mid-2008 to the present, including most recently into the geographic locus of the Senator Menendez public corruption investigation.

I. This illegal conduct meets and exceeds the legal definition of severe human trafficking for the purposes of violations of other statutes, involuntary servitude at 18 U.S.C. § 1584, peonage at 18 U.S.C. § 1581, forced labor at 18 U.S.C. § 1589, is classified as serious harm under 18 U.S.C. § 1589(c)(2), as human trafficking at 18 U.S.C. § 1590, and is a severe form of human trafficking under 22 U.S.C. § 7102 (11) in the duration, scope, and extent of its illegal conduct against the Lead Plaintiff in 44 states and multiple foreign nations from 1968 to the present. Since defendant DOJ and its agencies have been and are directly involved in perpetrating and perpetuating this egregious illegal conduct, defendant DOJ has and does willfully refuse to investigate and charge these crimes and turns its blind eye to this conduct by its own agencies and by its co-conspirator defendants.

J. In furtherance of this conspiracy, defendants have and do act in violation of federal statutes and the state laws of at least 44 states physically visited by Lead Plaintiff, and in violation of international laws and treaties, all as perpetrated by defendant UNITED STATES and its defendant co-conspirators:

(i) pretexting and acts, violations, and injuries directed at Lead Plaintiff and other members of this class of plaintiffs; by defendant UNITED STATES' election in its illegal discretionary acts in (ii) permitting, enlisting, empowering, and/or enabling domestic and foreign fraudulent actors electronically screened in by defendants, (iii) permitting,

enlisting, empowering, and/or enabling foreign intelligence services of countries pretexted and/or physically visited by Lead Plaintiff, and/or (iv) pretexted regarding Lead Plaintiff to cause other discriminatory illegal acts targeting Lead Plaintiff, and/or other members of this class of plaintiffs, in violation of US law and of their own laws, and of any reasonable standard of practice, in

(a) their series of schemes, conspiracies, injuries, and deprivations of rights, and of (b) deprivations of Privileges and Immunities, including, without limitation, (b-i) Lead Plaintiff's rights to free, equal, and non-discriminatory access to acquire, possess, retain, and enjoy all forms of property, including those rights to same as guaranteed under ratified international treaties, and (b-ii) including such rights as they relate to employment, interstate commerce, and to closely held business entities. Defendants have and do injure the Lead Plaintiff and other members of the class by such deprivations of rights. Locations and particular details of many of these acts, violations, and injuries are unknown at the time of this Complaint subject to discovery.

K. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and

laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	Facts - Subcount Series	Subcount(s)
600-603	NSEC National Security Pretexting and Entanglements	1-4
604-608, 610, 611, 613-615	HEXP Illegal Human Experimentation	1-5, 7, 8, 10-12
623-625, 632-634	RGTS Individual Rights Violations and Conspiracies	3-5, 12-14
639-693	RICO Racketeering	1-55
694-710	LTHL Lethality Attempts	1-17

810. CLAIMS FOR RELIEF - COUNT 10

Violations of Constitutional Rights Under the First, Fourth, Fifth, Eighth, Thirteenth, Fourteenth Amendments

Torture – Mental and Physical Abuse

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. §§ 175, 1961-1968, 1981, 2340A
Washington:	RCW §§ 9A.36.011(1)c, 9A.36.021(1)d, f, 9A.36.060
New Jersey:	NJ Stat §§ 2C:41-1 through 2C:41-6, 10:6-2
New York:	New York Penal L. §§ 120.10, 120.25, 120.30, 120.35, 460.00 through 460.80
California:	Cal Penal Code § 206
Massachusetts:	Mass. Gen. L ch 265 § 13a
Arizona:	NA
Texas:	NA
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Defendants identified at paragraph 799, together with other unknown defendants to

be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph.

B. Defendants have and do plan, conspire, perpetrate and engage in physical biochemical and psychological (mental) torture undertaken by defendant CIA on various persons as found by the Senate Intelligence Community in 2014 (paragraph 340), which focused on foreign nationals in the aftermath of the 9/11/2001 attacks. The Lead Plaintiff has experienced (i) coercive psychological operations which present as torture, (ii) biochemically enhanced coercive torture operations combined with coercive psychological operations, and (iii) combined coercive biochemical, psychological, and direct and indirect physical torture, in a progression of sequences Kirkland, WA, to Boston, MA to Cliffside Park, NJ. This seven year stairstep torture progression began with defendants UNITED STATES, DOJ, FBI, CIA, NIAID, particularly defendants FAUCI and ROSENBERG soon after the wrecking of Allegent, LLC was accomplished in:

(i) Washington (coercive psychological and BRMT biochemical torture forms),

(ii) Massachusetts while homeless (coercive psychological, BRMT biochemical, and medical short cycle direct physical torture forms),

(iii) New Jersey/New York (coercive psychological, BRMT biochemical, BRMT short and long cycle physical torture forms)

soon after Lead Plainitff's abrupt termination from defendant ESTABLISH and the imposed manipulated relationship distress by defendant MODDERMAN which accompanied that employment termination. The surrounding life events during this torture progression which added further psychological weight to this NJ/NY conspiracy, the fraudulent Pankowski wedding where two principal perpetrators defendant ROSENBERG and ROSS appeared, and the close

proximity in time MODDERMAN relationship termination, at paragraphs 465, 466, 602W NSEC-3.

C. This methodological stairstep torture progression is detailed at paragraphs 604-607 HEXP-1-4. This stairstep torture progression began with a measured baseline - the Jennifer Dunn 90 minute Capitol Hill interview (paragraphs 602J, 602N NSEC-3) and continuing frequent direct exposure to defendant FAUCI which occurred after the 9/11/2001 attack until Lead Plaintiff's August 30, 2002 orchestrated resignation (paragraph 602 NSEC-3), and then progressed over approximately 7 years through continually more depraved and aggressive stairstep sequence of combined forms of torture described in subparagraph 810B above. This depraved sequence continued until the October 2010 kidnapping for fraudulent concealment litigation duress after defendant CHALOM rendered Lead Plaintiff homeless again (paragraph 808). These short-cycle torture forms then recurred again beginning in 2021 and have continued episodically since that time, including while returning from attempts to deliver information regarding these and other events to Congress, DOJ, and the Supreme Court on October 10, 2023, paragraphs 607, 617-619 HEXP-4, 14-16.

D. The *Journal of the American Medical Association* has republished scientific medical research on these forms of torture, noting the lack of distinction relating to the damage to human sufferers of torture regardless of form:

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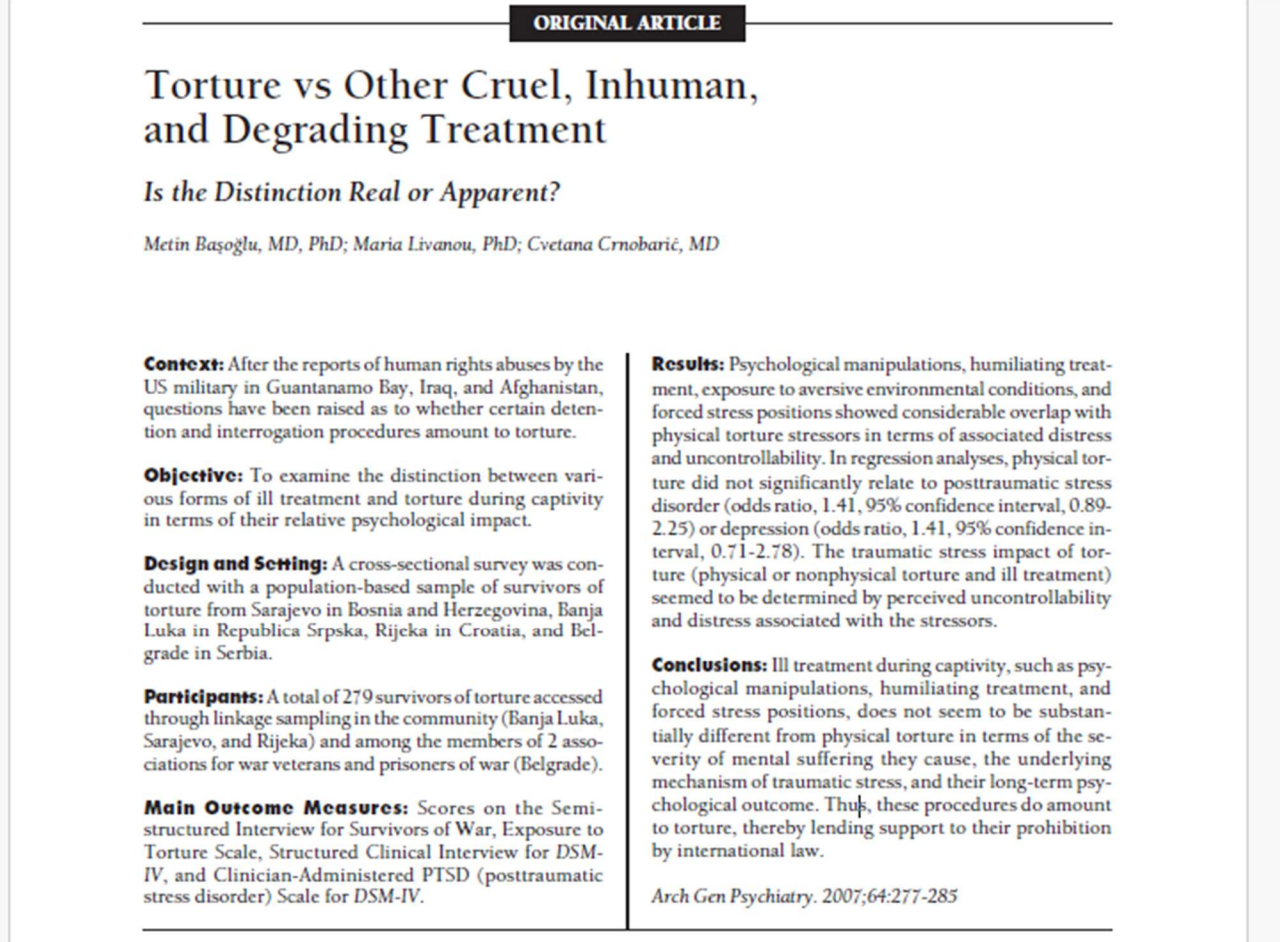


ORIGINAL ARTICLE

Torture vs Other Cruel, Inhuman, and Degrading Treatment

Is the Distinction Real or Apparent?

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

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

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

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

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

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

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

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

Arch Gen Psychiatry. 2007;64:277-285

Source: *Arch Gen Psychiatry.* 2007;64:277-285 republished in *JAMA* 2007. See LPEEV65-1 for the full article.

E. Torture is legally defined at 18 U.S.C. §§ 2340 as:

> **(1)** "torture" means an act committed by a person acting under the color of law specifically intended to inflict severe physical or mental pain or suffering (other than pain or suffering incidental to lawful sanctions) upon another person within his custody or physical control;
> **(2)** "severe mental pain or suffering" means the prolonged mental harm caused by or resulting from—
> **(A)** the intentional infliction or threatened infliction of severe physical pain or suffering;
> **(B)** the administration or application, or threatened administration or application, of mind-altering substances or other procedures calculated to disrupt profoundly the senses or the personality;
> **(C)** the threat of imminent death; or
> **(D)** the threat that another person will imminently be subjected to death, severe physical pain or suffering, or the administration or application of mind-altering substances or other procedures calculated to disrupt profoundly the senses or personality; and

> **(3)** "United States" means the several States of the United States, the District of Columbia, and the commonwealths, territories, and possessions of the United States.

F. As discussed at paragraphs 47-70, defendant UNITED STATES and all other defendants both known and currently unknown, and their officers, agents, confidential informants, contractors, assigns, or others, associated with any or all of these torturous acts, are constitutionally prohibited from asserting any waiver of liability or immunity for their conspiracies and for their injuries to Lead Plaintiff and other members of this class of plaintiffs under 18 U.S.C. § 2340B, as prohibited by the *Eighth* Amendment prohibition on cruel and unusual punishment, which is not waived by these defendants' failure to comply with the *Fifth* Amendment due process prerequisite to any form of punishment whatsoever, nor by prevailing case law in *Harlow* and other prevailing case law, nor by *The Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment,* as ratified by the Senate, which mandates recovery of civil damages and other civil remedies for torture and other inhumane and degrading treatment as follows:

> "Article 14
> 1. Each State Party shall ensure in its legal system that the victim of an act of torture obtains redress and has an enforceable right to fair and adequate compensation, including the means for as full rehabilitation as possible. In the event of the death of the victim as a result of an act of torture, his dependents shall be entitled to compensation."

G. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and

(iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	**Facts - Subcount Series**	**Subcount(s)**
	NSEC National Security Pretexting and Entanglements	
604-619	HEXP Illegal Human Experimentation	1-16
	RGTS Individual Rights Violations and Conspiracies	
	RICO Racketeering	
696, 698, 710	LTHL Lethality Attempts	3, 5, 17

[Intentionally left blank.]

811. CLAIMS FOR RELIEF - COUNT 11

Violations of Constitutional Rights Under the First, Fourth, Fifth, Eighth, Thirteenth, Fourteenth Amendments

Conspiracy to Torture

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. §§ 175, 1961-1968, 1981, 2340A
Washington:	RCW §§ 9A.28.030, 9A.28.040
New Jersey:	NJ Stat §§ 2C:41-1 through 2C:41-6, 10:6-2
New York:	New York Penal L. §§ 105.15, 120.10, 120.25, 120.30, 120.35, 460.00 through 460.80
California:	Cal Penal Code §§ 182, 206
Massachusetts:	Mass Gen L ch 265 § 13a, ch 274 § 7
Arizona:	NA
Texas:	NA
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Paragraphs 810B and 810C are specifically referenced for description of this durable illegal science and medical research driven conspiracy. Paragraphs 810D, 810E, and 810F are specifically referenced for description of the specific scope of harms to victims, for definition of torture, and for legal right of action required under the ratified international 1992 *Torture Treaty* having force of law in the United States, in accordance with our Constitution, Article VI, clause 2, federal supremacy clause. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph.

B. Defendants have and do plan, conspire, perpetrate and engage in their series of conspiracies and their willful engagement in torturous acts (both violent and aggressive series' of acts, and perpetually harassing series' of acts) to the Lead Plaintiff, among other acts, injuries, and violations at the final subparagraph in this paragraph.

C. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	**Facts - Subcount Series**	**Subcount(s)**
600-603	NSEC National Security Pretexting and Entanglements	1-4
604-620	HEXP Illegal Human Experimentation	1-17
629-632, 635	RGTS Individual Rights Violations and Conspiracies	9-12, 15
639-693	RICO Racketeering	1-55
694-710	LTHL Lethality Attempts	1-17

812. CLAIMS FOR RELIEF – COUNT 12

Violations of Constitutional Rights Under the First, Fourth, Eighth, Thirteenth, Fourteenth Amendments

Assault

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. §§ 175, 1961-1968, 1981
Washington:	RCW §§ 9A.36.011(1)c, 9A.36.021(1)d, f, 9A.36.060
New Jersey:	NJ Stat §§ 2C:12-1, 2C:41-1 through 2C:41-6, 10:6-2
New York:	New York Penal L. §§ 105.15, 120.00, 120.05, 120.10, 460.00 through 460.80
California:	Cal Penal Code §§ 241, 245(a)(1)
Massachusetts:	Mass Gen L ch 265 § 13a
Arizona:	AZ Rev Stat § 13-1203
Texas:	TX Penal Code § 22.01
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph. Paragraph 810 in its entirety and all refences therein are specifically incorporated by reference.

B. Defendants have and do plan, conspire, perpetrate and engage in their series of conspiracies and their willful engagement in assaultive acts (both physically and psychologically violent and aggressive series' of acts, and perpetually harassing series' of acts) to the Lead Plaintiff, among other acts, injuries, and violations at the final subparagraph in this paragraph, both within and without the territory of these states and of the United States.

C. Defendant UNITED STATES through its officers, agents, confidential informants, both separately and together with other known and unknown defendants, all operating either remotely or undercover in plainclothes and undistinguishable from the general public, intentionally and unlawfully attacked, both physically through indirect means using the illegal

BRMT bioweapon and bioweapon delivery system and by their coercive psychological operations, Lead Plaintiff and other plaintiffs from time to time from the 1970s to the present, as described by a very small set of example incidents described herein, and in so doing attempted or threatened by their words and/or acts to do physical harm to Plaintiffs. Plaintiffs each reasonably suffered apprehension of imminent harmful or offensive contact on a daily or near daily basis throughout much of this 56 year period both within and without the territory of the United States as a result.

D. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	Facts - Subcount Series	Subcount(s)
	NSEC National Security Pretexting and Entanglements	
604-620	HEXP Illegal Human Experimentation	1-17
632	RGTS Individual Rights Violations and Conspiracies	12
639	RICO Racketeering	1
694-710	LTHL Lethality Attempts	1-17

813. CLAIMS FOR RELIEF - COUNT 13

Violations of Constitutional Rights Under the First, Fourth, Eighth, Thirteenth, Fourteenth Amendments

Aggravated Battery

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. §§ 175, 1961-1968, 1981
Washington:	RCW §§ 9A.36.011(1)c, 9A.36.021(1)d, f, 9A.36.060
New Jersey:	NJ Stat §§ 2C:12-1(b), 2C:41-1 through 2C:41-6, 10:6-2
New York:	New York Penal L. §§ 105.15, 120.00, 120.05, 120.10, 460.00 through 460.80
California:	Cal Penal Code § 242
Massachusetts:	Mass Gen L ch 265 § 13a
Arizona:	AZ Rev Stat § 13-1204
Texas:	TX Penal Code § 22.02
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph. Paragraph 810 in its entirety and all refences therein are specifically incorporated by reference.

B. Defendants have and do plan, conspire, perpetrate and engage in this paragraph in their series of conspiracies and their willful engagement in assaultive acts (both physically and psychologically violent and aggressive series' of acts, and perpetually harassing series' of acts) to the Lead Plaintiff, among other acts, injuries, and violations at the final subparagraph in this paragraph, both within and without the territory of these states and of the United States.

C. Defendant UNITED STATES using BRMT and its officers, agents, confidential informants, both separately and together with other known and unknown defendants, all operating either remotely or undercover in plainclothes and undistinguishable from the general public, intentionally and unlawfully attacked Lead Plaintiff and other plaintiffs from time to time from the 1960s to the present, using the illegal BRMT bioweapon and bioweapon delivery system, as illustrated by the very small subset of 110 examples described herein, and in so doing acted to do physical and psychological harm to plaintiffs. Defendant UNITED STATES using BRMT and, at times other defendants intentionally and unlawfully attacked Plaintiffs as described in subcounts below, have and do cause assaultive, harmful, and offensive bodily contact to Lead Plaintiff and other members of this class of plaintiffs since at least 1968, both within and without the territory of the United States as a result.

D. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead

Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	Facts - Subcount Series	Subcount(s)
	NSEC National Security Pretexting and Entanglements	
604-620	HEXP Illegal Human Experimentation	1-17
	RGTS Individual Rights Violations and Conspiracies	
	RICO Racketeering	
694-710	LTHL Lethality Attempts	1-17

814. CLAIMS FOR RELIEF - COUNT 14

Violations of Constitutional Rights Under the First, Fourth, Eighth, Thirteenth, Fourteenth Amendments

Soliciting Crime of Violence

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. §§ 373, 1961-1968
Washington:	RCW § 9A.28.030
New Jersey:	NJ Stat §§ 2C:5-2, 2C:41-1 through 2C:41-6, 10:6-2
New York:	New York Penal L. §§ 100.00, 100.10, 460.00 through 460.80
California:	NA
Massachusetts:	NA
Arizona:	NA
Texas:	NA
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph.

B. Defendants have and do plan, conspire, perpetrate and engage in their series of solicitations to commit a crime of violence and related conspiracies to cause and create injury, death, assault, aggravated assault, and other crimes of violence to the Lead Plaintiff, among other

acts, injuries, and violations at the final subparagraph in this paragraph, both within and without the territory of these states and of the United States. This includes as the proximate cause, for the purpose of inflicting extreme trauma during the illegal human experimentation on Lead Plaintiff and other family members in the development of the illegal BRMT bioweapon and bioweapon delivery system, of the prescribed aspirin/codeine overdosed death of Sandra Darlene Brewer (age 11) during an episode of influenza in April 1975, at the hands of a certain medical doctor KOHLER (paragraphs 99d, 211, 417, 418, 714, 740, 803C-D, 805B(i), H, S, BS, 806B, 814B), then practicing medicine in Federal Way, WA, where Lead Plaintiff lived with his family of origin (age 14), in conspiracy with the illegal BRMT bioweapon operations managed by defendant BREYER (ARMY, CIA, DOJ, FBI, USMS, and unknown other defendants). This further incorporates the death of Audrey Brewer in September 2011, at the hand of an emotionally traumatized and otherwise completely non-violent person through the direct abuse of apparent perpetrator and victim by the illegal BRMT bioweapon and bioweapon delivery system preceding and during that violent homicide in Walla Walla, WA, where Lead Plaintiff's uncle and descendants have and do reside (paragraph 10, 412, 413, 600B, Interline Exhibit 1). The sequences of lethality attempts, torture, assaults, and batteries described at subparagraph 814C table below are also directly attributable to the acts and conspiracies of defendant UNITED STATES, its department and agencies, its other police powers co-conspirators, and other known and unknown defendants. These acts, violations, and injuries comprise an integral pattern of explicit and implicit solicitations of crimes of violence by these defendants.

C. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant

UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	**Facts - Subcount Series**	**Subcount(s)**
	NSEC National Security Pretexting and Entanglements	
616	HEXP Illegal Human Experimentation	13
	RGTS Individual Rights Violations and Conspiracies	
	RICO Racketeering	
694-710	LTHL Lethality Attempts	1-17

[Intentionally left blank.]

815. CLAIMS FOR RELIEF 15

Violations of Constitutional Rights Under the First, Fourth, Fifth, Eighth, Thirteenth, Fourteenth Amendments

Interference With Interstate Commerce By Threats or Violence

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. §§ 175, 1951, 1961(1)(A), 1961(1)(G), 1961-1968, 1992(b)(3), 2332, 2340A
Washington:	RCW §§ 9A.28.030, 9A.36.011(1)c, 9A.36.021(1)d, f, 9A.36.060
New Jersey:	NJ Stat §§ 2C:5-2, 2C:12-1, 2C:41-1 through 2C:41-6, 10:6-2
New York:	New York Penal L. §§ 100.00, 100.10, 105.15, 110.00, 120.00, 120.05, 120.10, 120.25, 120.30, 120.35, 125.20, 125.27(a)(v), 135.05, 135.35, 135.60, 460.00 through 460.80, 490.25
California:	Cal Penal Code §§ 186 through 186.8
Massachusetts:	NA
Arizona:	NA
Texas:	NA
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph.

B. Defendants have and do plan, conspire, perpetrate and engage to interfere in and affect interstate commerce by making, and by acting upon, threats with violence. Among other acts, injuries, and violations at the final subparagraph in this paragraph, defendants within one four month period in 2022, (i) made an indirect verbal threat on the Lead Plaintiff in a New York City performance space on July 16, 2022 as described at Interline Exhibit 15A; (ii) a mass transit derailment attempt initiated just after sundown while traveling toward the setting sun in the train engineer's eyes at 50-60 mph against an express train operating on the Metropolitan Transportation Authority Hudson River Line on September 11, 2022 with the Lead Plaintiff as a passenger as described in paragraph 707 LETHL-14 (Interline Exhibit 15B), (iii) upon the Lead

Plaintiff in defendant NYC (City of New York) Morningside Park on September 17, 2022 while using the illegal BRMT bioweapon and bioweapon delivery system, as described at paragraph 708 LETHL-15 (Interline Exhibit 15C), and (iv) on NYC (New York City) streets with their streetlights deliberately extinguished on November 18, 2022, and by a rapidly accelerating vehicle in a BERGEN (Bergen County) New Jersey shopping center parking lot on November 19, 2022 as described at LETHL-16 while traveling to and from theater performances (see also Interline Exhibit 15D, and these two specific theater performances listed at LPEEV65-5). The Bio-Lab arson fire and US Airways Flight 1549, paragraphs 602 NSEC-3, 606A-D HEXP-3, 673 RICO-35, both proximate to the Lead Plaintiff in relationship (Bio-Lab, paragraph 602 NSEC-3) or location (US Airways 1549, paragraph 606B, C, D HEXP-3), are elements of this overall pattern of domestic violence and sabotage intended by defendant UNITED STATES to create the appearance of mayhem and violence following the Lead Plaintiff consistent with its other unfounded rumors and misdirection intended to skyline Lead Plaintiff as the root cause of this violence which these defendants themselves directly created to conceal their other illegal acts and misdirection.

C. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of

whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	Facts - Subcount Series	Subcount(s)
	NSEC National Security Pretexting and Entanglements	
604-607	HEXP Illegal Human Experimentation	1-4
	RGTS Individual Rights Violations and Conspiracies	
	RICO Racketeering	
694, 700, 707-710	LTHL Lethality Attempts	1, 7, 14-17

816. CLAIMS FOR RELIEF - COUNT 16

Violations of Constitutional Rights Under the First, Third, Fourth, Eighth, Thirteenth, Fourteenth Amendments

Tampering With Witness

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. §§ 1512, 1961-1968
Washington:	RCW §§ 9A.72.110, 9A.72.120
New Jersey:	NJ Stat §§ 2C:28-5, 2C:41-1 through 2C:41-6, 10:6-2
New York:	New York Penal Law §§ 105.15, 120.25, 215.10, 215.15, 460.00 through 460.80
California:	Cal Penal Code § 140
Massachusetts:	Mass Gen L ch 268 § 13b
Arizona:	NA
Texas:	NA
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Defendants identified at paragraph 799, together with other unknown defendants to

be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph.

B. Defendants have and do plan, conspire, perpetrate and engage in their series of schemes, conspiracies, acts, injuries, and deprivations to tamper with, interfere with, and attempt to intimidate the Lead Plaintiff from, among other acts, injuries, and violations at the final subparagraph in this paragraph, contacting the US District Court for the District of Eastern California, the US District Court for the District of Columbia, the office of the US Attorney for the Southern District of New York, the Department of Justice, and the Public Integrity section of the Attorney General of New Jersey, as specifically cited and described in the subcounts in this complaint. Perpetual prejudicial acts which constitute tampering have and do continue from at least 2002 when the Lead Plaintiff was subjected to porn spam on his work computer by defendant PRAY at CNA, through his multiple attempts to contact the federal executive in 2005 in Washington, DC which are documented in digital documentary evidence handed directly to defendant ROSENBERG (FBI) around October 2007 at defendant ESTABLISH, Fort Lee, NJ and in defendant FBI's possession absent its destruction of evidence, and since that time in all acts, violations, and injuries undertaken by these plaintiffs for the purposes of, without limitation, facilitating the continued development of the illegal BRMT bioweapon and bioweapon delivery system, depriving the Lead Plaintiff of rights and property, acting in a long series of accelerated lethality events, and in defendants' other acts, injuries, and violations documented in this complaint.

C. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant

UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	**Facts - Subcount Series**	**Subcount(s)**
600-603	NSEC National Security Pretexting and Entanglements	1-4
604-608, 611-620	HEXP Illegal Human Experimentation	1-5, 8-17
622, 624-637	RGTS Individual Rights Violations and Conspiracies	2, 4-17
639-648, 654-680, 682-693	RICO Racketeering	1-10, 16-42, 44-55
695-710	LTHL Lethality Attempts	2-17

[Intentionally left blank.]

817. CLAIMS FOR RELIEF - COUNT 17

Violations of Constitutional Rights Under the First, Fourth, Eighth, Thirteenth, Fourteenth Amendments

Tampering With Witness – Evidence

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. §§ 1513, 1961-1968
Washington:	RCW §§ 9A.72.150
New Jersey:	NJ Stat §§ 2C:28-6, 2C:41-1 through 2C:41-6, 10:6-2
New York:	New York Penal Law §§ 105.15, 215.40, 460.00 through 460.80
California:	NA
Massachusetts:	NA
Arizona:	NA
Texas:	NA
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph.

B. Defendants have and do plan, conspire, perpetrate and engage in their series of schemes, conspiracies, acts, injuries, and deprivations to tamper with, interfere with, and/or attempt to intimidate the Lead Plaintiff from contacting the US District Court for the District of Eastern California, the US District Court for the District of Columbia, the office of the US Attorney for the Southern District of New York, the Department of Justice, and the Public Integrity section of the Attorney General of New Jersey, among other acts, injuries, and violations at the final subparagraph in this paragraph. Perpetual prejudicial acts which constitute tampering have and do continue from at least 2002 when the Lead Plaintiff was subjected to porn spam on his work computer by defendant PRAY at CNA, through his multiple attempts to contact the federal executive in 2005 in Washington, DC which are documented in digital documentary evidence handed directly to defendant ROSENBERG (FBI) around October 2007

at Establish, Fort Lee, NJ and in defendant FBI's possession absent its destruction of evidence, and since that time in all acts, violations, and injuries undertaken by these plaintiffs for the purposes of, without limitation, facilitating the continued development of the illegal BRMT bioweapon, depriving the Lead Plaintiff of rights and property, acting in a long series of accelerated lethality events, and in defendants' other acts, injuries, and violations documented in this complaint. One recent example of these myriad obstructions of justice by defendant UNITED STATES, which mirrors the long-running patterns of obstructive conduct described in (i) the Senate Select Committee Report in 1975 (LPEE pages 237-271. 6885-7466) (ii) the Senate Intelligence Committee in 2014 (paragraphs 336-340), (iii) 45 years of scofflaw conduct related FISA Act (iv) 15 years of PATRIOT Act Section 702 rights abuses, all by defendant UNITED STATES (paragraphs 308, 320), and (v) as a pattern of practice directly Lead Plaintiff in the table below follows:

> INCIDENT REPORT – DATA STRIP FROM OLDER CELL PHONE NO LONGER IN USE 240204
> Available phone data old phone, all other date contacts wiped from phone from 2019 to early 2020, they were on phone yesterday when booted for first time since last use in appx 2022. Deleted from old phone by defendant UNITED STATES remote electronic hack during charging from cold dead state (most likely penetrated and deleted through the electrical service to 1210 City Place residential unit while recharging overnight for retrieval)
> Also see photos taken on current cell phone on 240204 which document the calendar entries below from the old Samsung Galaxy cell phone:
>
> > 191215 Starbucks Park and 29th, GIA, both late to location, then to American Academy of Dramatic Artists for play entitled "Clybourne Park"
> > 191225 Café du Soleil, 4 White female pickets there on my arrival, no other customers appeared during this brunch, GIA approximately 1 hour late for brunch, 396 W Broadway
> > 191229 Reservation Laduree SOHO, unknown party
> > 210214 Bocado, 1293 Lexington Ave, pink teddy bear, GIA

C. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended

family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	**Facts - Subcount Series**	**Subcount(s)**
600-603	NSEC National Security Pretexting and Entanglements	1-4
604-608, 611-620	HEXP Illegal Human Experimentation	1-5, 8-17
622, 624-637	RGTS Individual Rights Violations and Conspiracies	2, 4-17
639-648, 654-680, 682-693	RICO Racketeering	1-10, 16-42, 44-55
695-710	LTHL Lethality Attempts	2-17

[Intentionally left blank.]

818. CLAIMS FOR RELIEF - COUNT 18

Violations of Constitutional Rights Under the First, Third, Fourth, Eighth, Thirteenth, Fourteenth Amendments

Retaliating Against Witness

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. §§ 1513, 1961-1968
Washington:	RCW §§ 9A.72.110, 9A.72.120
New Jersey:	NJ Stat §§ 2C:28-5, 2C:41-1 through 2C:41-6, 10:6-2
New York:	New York Penal Law §§ 105.15, 120.25, 215.10, 215.15
California:	Cal Penal Code § 140
Massachusetts:	Mass Gen L ch 268 § 13b
Arizona:	NA
Texas:	NA
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph.

B. Defendants have and do plan, conspire, perpetrate and engage in their series of schemes, conspiracies, acts, injuries, and deprivations to tamper with, interfere with, attempts to intimidate, and retaliate against the Lead Plaintiff from contacting the US District Court for the District of Eastern California, the US District Court for the District of Columbia, the office of the US Attorney for the Southern District of New York, the Department of Justice, and the Public Integrity section of the Attorney General of New Jersey, among other acts, injuries, and violations at the final subparagraph in this paragraph. Perpetual prejudicial acts which constitute retaliating have and do continue from at least 2002 when the Lead Plaintiff was subjected to porn spam on his work computer by defendant PRAY at CNA, through his multiple attempts to contact the federal executive in 2005 in Washington, DC, and since that time in all acts, violations, and injuries undertaken by these plaintiffs for the purposes of, without limitation,

facilitating the continued development of the illegal BRMT bioweapon, depriving the Lead plaintiff of rights and property, acting in a long series of accelerated lethality events, and in defendants' other acts, injuries, and violations documented in this complaint.

C. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	Facts - Subcount Series	Subcount(s)
600-603	NSEC National Security Pretexting and Entanglements	1-4
604-608, 611-620	HEXP Illegal Human Experimentation	1-5, 8-17
622, 624-637	RGTS Individual Rights Violations and Conspiracies	2, 4-17
639-648, 654-680, 682-693	RICO Racketeering	1-10, 16-42, 44-55

695-710	LTHL Lethality Attempts	2-17

819. CLAIMS FOR RELIEF - COUNT 19

Violations of Constitutional Rights Under the First, Fourth, Eighth, Thirteenth, Fourteenth Amendments

Tampering With Consumer Products

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. § 1365(a)
Washington:	NA
New Jersey:	NJ Stat §§ 2C:12-1(b), 2C:40-17.2.a, 10:6-2
New York:	NA
California:	NA
Massachusetts:	NA
Arizona:	NA
Texas:	NA
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph.

B. Defendants have and do plan, conspire, perpetrate and engage in, among other acts, injuries, and violations at the final subparagraph in this paragraph, contaminated and spoiled refrigerated foods were placed upon grocery store shelves at ACME MARKETS, Edgewater, NJ in 2021 and 2022 for sale on more than one dozen occasions to the Lead Plaintiff as specifically cited and described in paragraph 620 HEXP-17. Defendants have and do create injuries and construct thereby a risk of death or severe injury by listeria, salmonella, and other harmful biological agents specifically directed at Lead Plaintiff through their purposeful stocking to shelves immediately prior to his arrival at the grocery store at 481 River Road, Edgewater, NJ of contaminated and/or spoiled foods and by permitting access to same by the Lead Plaintiff and the general public in 2008-2010 and from 2018 to the present, most probably by defendant USMS

personnel embedded as store employees, just as defendant FBI had personnel posing as store investors, partners, and employees in Larry's Market, Federal Way, WA when Lead Plaintiff was employed there by his father's cousin, Larry Brewer, in 1972-1974 (paragraphs 99K, 417-418, 449, 600F, 602). This is further evidenced by (i) the deletion of records of email correspondence with Albertsons Companies Headquarters Customer Service unit and with the Bergen County Health Department from his personal computer email accounts when he searched for these records during litigation preparation in 2023, and (ii) the notable absence of certain specific products normally carried by this store and on his shopping list for that specific trip which shelf locations completely disappeared or were emptied, and later reappeared in the identical shelf slot. Detailed examples of this element of the long-running, comprehensive, and systematic pattern of racketeering acts and defendants' series' of violations, acts, deprivations, and injuries are currently blocked and inaccessible in email accounts as noted elsewhere in this Complaint, and are representative of these types of violations, acts, injuries, and deprivations also experienced by Lead Plaintiff from 2008 to 2010 at this same location, and by other plaintiff members of this class.

C. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of

whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	Facts - Subcount Series	Subcount(s)
	NSEC National Security Pretexting and Entanglements	
620	HEXP Illegal Human Experimentation	17
	RGTS Individual Rights Violations and Conspiracies	
	RICO Racketeering	
	LTHL Lethality Attempts	

820. CLAIMS FOR RELIEF - COUNT 20

Violations of Constitutional Rights Under the First, Third, Fourth, Fifth, Eighth, Thirteenth, Fourteenth Amendments

Involuntary Servitude – Title 18 RICO

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. §§ 1584, 1961-1968
Washington:	RCW §§ 9A.40.100
New Jersey:	NJ Stat. §§ 2C:13-8, 2C:41-1 through 2C:41-6, 10:6-2
New York:	NA
California:	Cal Penal Code §§ 236, 236.1(a) Cal Labor Code §§ 2801, 2802 Cal Civil Code §§ 1708-1725
Massachusetts:	Mass Gen L ch 265 § 51
Arizona:	AZ Rev Stat § 13-1308
Texas:	TX Penal Code § 20A.02
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Paragraph 821C through I, and paragraph 822C and D are particularly incorporated

herein for specific relevance to this paragraph 820. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph.

B. Defendants have and do plan, conspire, perpetrate and engage in illegal conduct which meets and exceeds the legal definition of involuntary servitude at 18 U.S.C. § 1584, peonage at 18 U.S.C. § 1581, forced labor at 18 U.S.C. § 1589, is classified as serious harm under 18 U.S.C. § 1589(c)(2), as human trafficking at 18 U.S.C. § 1590, and is a severe form of human trafficking under 22 U.S.C. § 7102 (11) in the duration, scope, and extent of its illegal conduct against the Lead Plaintiff in 44 states and multiple foreign nations from 1968 to the present. Since defendant DOJ and its agencies have been and are directly involved in perpetrating this conduct, it has and does willfully refuse to investigate and charge these crimes and turns its blind eye to this conduct by its own agencies and by other co-conspirator defendants.

C. The *Thirteenth* Amendment prohibits involuntary servitude directed at any person by any person, with the only exception being upon a conviction by due process respecting rights. In considering and legally defining conditions which constitute involuntary servitude, the Supreme Court found in *United States v. Kozminski*, 487 U.S. 931 (1988), as excerpted here at 932, 933 (emphasis added):

> "(b) The language and legislative history of § 1584 and its statutory progenitors indicate that its reach should be limited to cases involving the compulsion of services by the use or threatened use of physical or legal coercion. That is the understanding of the Thirteenth Amendment's "involuntary servitude" phrase that prevailed at the time of § 1584's enactment and, since Congress clearly borrowed that phrase in enacting § 1584, the phrase should have the same meaning in both places absent any contrary indications. Section 1584's history undercuts the contention that Congress had a broader concept of involuntary servitude in mind when it enacted the statute.....
>
> (c) The Government's broad construction of "involuntary servitude" -- which would prohibit the compulsion of services by any type of speech or intentional conduct that, from the victim's point of view, either leaves the victim with no

tolerable alternative but to serve the defendant or deprives the victim of the power of choice -- could not have been intended by Congress. That interpretation would appear to criminalize a broad range of day-to-day activity; would delegate to prosecutors and juries the inherently legislative task of determining what type of coercive activities are so morally reprehensible that they should be punished as crimes; would subject individuals to the risk of arbitrary or discriminatory prosecution and conviction; and would make the type of coercion prohibited depend entirely on the victim's state of mind, thereby depriving ordinary people of fair notice of what is required of them.....The purposes underlying the rule of lenity for interpreting ambiguous statutory provisions are served by construing § 241 and § 1584 to prohibit only compulsion of services through physical or legal coercion. Pp. 487 U. S. 949-952.

(d) The latter construction does not imply that evidence of other means of coercion, or of extremely poor working conditions, or of the victim's special vulnerabilities, is irrelevant. The victim's vulnerabilities are relevant in determining whether the physical or legal coercion or threats thereof could plausibly have compelled the victim to serve....."

D. Repeating *United States v. Kozminski*, 487 U.S. 931 (1988), at 933 (emphasis added):

"The purposes underlying the rule of lenity for interpreting ambiguous statutory provisions are served by construing § 241 and § 1584 to prohibit only compulsion of services through physical or legal coercion."

Involuntary servitude is a pattern of pervasive coercion by force by another. A US person not permitted by government or by any person or conspiracy of persons and/or groups to be free to exercise their constitutional rights as they choose, in the absence of a proper judicial finding which validly subjects the person to some form of punishment or servitude, is the subject of coercion which is "the practice of persuading someone to do something by using force or threats" (as defined by the Cambridge Dictionary online). Such coerced persons are the involuntary servants of that force by those other party(ies), particularly when that coercion through force or threats is broadly and durably applied, as is the case for these plaintiffs in the Lead Plaintiff's own direct experience described herein.

E. Coercion specifically includes not only (i) explicit act(s) or threat(s) of force but also (ii) the surreptitious application of force, as when such methods incorporate the application of

physical and/or psychological pressure including, without limitation, by (a) the provision of specific profoundly objectionable and/or preferable options, and/or (b) the foreclosing of alternatives readily available to others by wrongful acts or persistent failures to act, when (c) the coercer uses these options and foreclosures for the purpose of forcibly threatening or acting to persuade or pressure a person to (d) act in a particular way or toward a specific outcome or behavior or set of outcomes or behaviors intended by (e) the coercing party(ies), including by government with its overwhelming police powers and relatively unlimited resources to (f) pursue the particular coercive directions it elects, whether or not it does so in good faith compliance with law and rights or for its own corrupt and illegal purposes under color of law.

F. Coercive force does not require any direct knowledge or understanding by the coerced person of any specific intention by the coercer to apply any force, including the forcing of an act by the coercer's election to foreclose preferable options when those coercive methods are applied by any surreptitious means available to the coercer (effectively acting in secret as the master of the involuntary servant). Repeating *United States v. Kozminski,* 487 U.S. 931 (1988), at 933 again (emphasis added):

> "The purposes underlying the rule of lenity for interpreting ambiguous statutory provisions are served by construing § 241 and § 1584 to prohibit only compulsion of services through physical or legal coercion."

G. Government possesses myriad means of surreptitious coercion for compulsion of services by both (a) its valid exercise of its legal authority in the use of surreptitious police powers tools, and (b) by any illegal exercise of those same police powers tools under color of law including, without limitation, by the illegal use of the BRMT bioweapon and bioweapon delivery system in violation of 18 U.S.C. § 175 to hijack the free will and actions of the plaintiff victim. These defendants, particularly defendant UNITED STATES, have engaged in a profoundly egregious broad and durable surreptitious pattern of acts, violations, and injuries of

constitutional rights for decades, all fraudulently concealed by profound abuses of the state secrets privilege, for the entire set of purposes and intentions (*mens rea*) identified at paragraphs 801-854.

H. These means of government coercion available to defendant UNITED STATES include, without limitation, (a) direct hijacking of human brain hormones which can and does directly and surreptitiously alter free will in ways which the human subject cannot directly detect by use of the illegal BRMT bioweapon and bioweapon delivery system. These means of government coercion available to defendant UNITED STATES and to other police powers include, without limitation, (b) electronic surveillance, (c) continual monitoring, (d) directed manipulations and acts knowingly undertaken by others, whether voluntarily, or themselves under threat and/or under obligation not to disclose their coercion and their plan of coercion; (e) undertaken by frauds, such as mail, wire, and electronic frauds; (f) undertaken by means of shadow investments, services, financial devices such as shadow banks, and (g) by other technological devices and human methods available to government with their comparatively unlimited resources, but not generally known to the public. The evidence of targeting, and perverse coercion of these plaintiffs by defendant UNITED STATES and its co-conspirators in plaintiffs' destroyed careers, families, and businesses is profound and overwhelming.

I. Defendant UNITED STATES and co-conspirator defendants have and do act in systematic fraudulently concealed violations of this *Thirteenth* Amendment constitutional right and against other rights of Lead Plaintiffs and of other plaintiffs of this class by, in Lead Plainitff's specific case, initially subjecting and then sustaining involuntary servitude by, without limitation, (i) embedding him into their surreptitious illegal cover company employment; by (ii) assigning direct embedded minders into his personal life; by (iii) contriving and orchestrating female companions; by (iv) contriving and destroying marital communityin 1987-88; by (v)

orchestrating, creating, and destroying a fraudulently coerced marital community in 1988-2005 in direct violation of, among others, the *Third* Amendment by using a coerced and threatened with criminal prosecution active duty ARMY soldier as the orchestrated spouse from first introduction in 1988, fraudulent marriage in 1990, periodic orchestrated absences, and an associated-in-fact enterprise pattern of racketeering acts through the first half of 2005; by (vi) controlling all professional employment from 1977; by (vii) controlling all periods of unemployment from 1977 to the present day; (viii) by controlling and destroying all Lead Plaintiff's numerous attempts and efforts to affect and to engage in independent in-state, interstate, and international commerce from 1983; (ix) by subjecting him without consent to perpetual video and other intrusive surveillance from an unknown date; by (x) creating and sustaining false public narratives; by (xi) literally putting words in his mouth and thoughts in his mind using the illegal BRMT bioweapon and bioweapon delivery system, among other acts, injuries, and violations also described at the final subparagraph in this paragraph, both within and without the territory of the United States.

J. These decades long pattens of coercive exercise of police powers, by these police powers defendants' own acts, violations, and injuries to these plaintiffs, and by the acts, violations, and injuries it permits others to undertake jointly and/or severally through privileged access such as members of the press, media, and entertainment industries, and other persons who are defendants herein and still others as yet unknown, and in the knowing failures of police powers to protect these plaintiffs, are all knowing and willful abuses of the constitutional rights of these plaintiffs in defendants' associated-in-fact enterprise pattern of acts, violations, racketeering acts, and injuries to constitutional rights.

K. In response to the erosions of constitutional rights in *United States v. Kozminski,* 487 U.S. 931 (1988) finding that "absent any contrary indications….Section 1584's history undercuts

the contention that Congress had a broader concept of involuntary servitude in mind," Congress in 2000 adopted new statutory findings and new protections for victims of involuntary servitude and human trafficking, including for the purpose of further defining involuntary servitude (including through the forms known as peonage and forced labor) in 18 U.S.C. § 1589 and 22 U.S. Code Chapter 78. Congressional intent expressed in 18 U.S.C. § 1589 holds that:

> "(13) Involuntary servitude statutes are intended to reach cases in which persons are held in a condition of servitude through nonviolent coercion. In *United States v. Kozminski,* 487 U.S. 931 (1988), the Supreme Court found that section 1584 of title 18, should be narrowly interpreted, absent a definition of involuntary servitude by Congress. As a result, that section was interpreted to criminalize only servitude that is brought about through use or threatened use of physical or legal coercion, and to exclude other conduct that can have the same purpose and effect."

L. Congress also further defined involuntary servitude and the severe form of human trafficking at 22 U.S. Code § 7102 (emphasis added):

> "(8) Involuntary servitude - The term "involuntary servitude" includes a condition of servitude induced by means of— (A) any scheme, plan, or pattern intended to cause a person to believe that, if the person did not enter into or continue in such condition, that person or another person would suffer serious harm or physical restraint; or (B) the abuse or threatened abuse of the legal process.
>
> (11) Severe forms of trafficking in persons. The term "severe forms of trafficking in persons" means.....(B) the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery."

M. Defendant UNITED STATES, through its departments and agencies, has and does engage in violations of the constitutional prohibition on involuntary servitude including, without limitation, severe forms of trafficking under color of law, through its abuse of police powers in the patterns of racketeering acts conducted by the associated-in-fact enterprise, which it has and does perpetrate, and has and does perpetuate both severally and jointly with other co-conspirator defendants. This illegal conduct meets and exceeds the legal definition of involuntary servitude

and is also *prima facie*, a severe form of human trafficking in the duration, scope, and extent of its illegal conduct against the Lead Plaintiff from 1968 to the present.

N. This defendants' pattern of practice of involuntary servitude explicitly incorporates, without limitation (i) indirect threats delivered visually and verbally on multiple occasions in public venues, and (ii) acts of physical violence to and including indirect, non-attributable injuries and lethality attempts (see, for example, Interline Exhibit 15 and paragraphs 604-607, 617-620 HEXP-1-4, 14-17, 694-710 LETHL-1-17), (iii) psychological coercion to terrorization and suicide ideation (see also listing below in this subparagraph) as intermixed with those lethality threats and attempts, all as perpetrated on Lead Plaintiff primarily by repeated psychopathic acts of coercion by defendant UNITED STATES, in conspiracy at various times and places with institutional, entity, and individual co-defendants including, without limitation, ROSENBERG, SUMMERS, CHALOM, WEISSMAN, MELBER, MODDERMAN, AKOTO, GIA, and currently unknown others. These sequences of illegal extreme psychological coercion (medically considered to be torture, paragraph 604D HEXP-1), and illegal BRMT bioweapon and bioweapon delivery system forcibly imposed biochemical hijackings - the repeated traumas of programmed divorces, human trafficking, and homelessness - were used in varying combinations and in close proximity in time for the maximum traumatic effects, which effects have been and are magnified in their extreme impacts using the illegal BRMT bioweapon and bioweapon delivery system. These illegal human subject brain hijacking biomedical experiments on unwitting human subjects without their consent, have and do propel illegal BRMT bioweapon and bioweapon delivery system development, testing, and deployment from 1988 to the present including, without limitation, during the following sequences of psychopathic coercion and violence by defendant UNITED STATES, particularly CIA and ARMY:

(i) Repeated lethality attempts from the mid-1980s to the present at paragraphs 694-710 LETHL-1-17 orchestrated by BURNS, WEISSMAN, ROSENBERG, others,

(ii) Divorce from Lynne 1987-1988 and marriage to SWAIN the installer of the double homicide attempt device used by defendant CIA at Porteau Cove, BC, Canada (paragraph 694 LETHL-1),

(iii) Lynne divorce trauma was orchestrated with the emotionally premature orchestrated introduction of fraudulent deferred military criminal prosecution coerced active duty bisexual soldier as spouse Jeanette and use of the illegal BRMT bioweapon and bioweapon delivery system oxytocin boosted in that orchestrated relationship with Jeanette beginning in middle 1988 after WATERS and others orchestrated that introduction,

(iv) Alliance business wrecking in 1990-1993, including 2.5 years with no compensation,

(v) Repeatedly broken compensation promises for approximately 12 months at PAN in 1993-1994,

(vi) Pacific Pipeline forced labor employment and abrupt termination without notice in 1995-1996,

(vii) CNA forced labor and peonage employment through compensation reduction theft attempt, litigation maneuvering abuses of state law in legal process between 1996 to 2002, after six months of programmed unemployment of 1996,

(viii) Multiple military orders programmed forced separations by Jeanette between 1990 and 2005 divorce,

(ix) Performa business wrecking with defendants KURGAN, PRAY, CALDWELL, others to financial ruin and complete loss of all income (state unemployment compensation is unavailable to self-employed persons) in 2002-2005,

(x) Kirkland suicide ideation orchestrated by coercive psychological operations and illegal BRMT bioweapon and bioweapon delivery system by FAUCI in 2003 or 2004,

(xi) Kirkland complete loss of income by 2004, loss of personal residence and final elements of financial starve-out to homelessness in 2005 by ROSENBERG,

(xii) Boston human trafficking into homelessness in 2005 for 21 months, by ROSENBERG, supported by SUMMERS,

(xiii) Retraumatization by repetition in Cliffside Park, NJ sequence ESTABLISH programmed and timed employment and abrupt unemployment, fake Pankowski wedding, and MODDERMAN relationship termination - all within about 100 days in 2008 by ROSENBERG, ROSS, MODDERMAN, and continuing use of illegal BRMT bioweapon and bioweapon delivery system for, among other things, the specific purposes of (a) inflicting symptoms of erectile dysfunction and (b) securing salacious and publicly humiliating videos of Lead Plaintiff to perpetuate malign defamatory public narrative.

(xiv) Retraumatization by repetition in the Cliffside Park, NJ force out to homelessness by CHALOM in 2010 within 110 days after filing a non-exhaustive federal civil rights lawsuit in 2010,

(xv) Bergen Regional psychiatric confinement through kidnapping without due process for six months from October 2010 through March 2011,

(xvi) Bergen Regional psychiatric confinement indirect duress to force dismissal of Newark federal civil rights complaint with indefinite confinement presented as an outcome "never be able to leave" inferred by the self-report of indefinite confinement of a "peer patient" actually an agent embedded for the purpose of delivering that specific message to Lead Plaintiff in 2010, while Ramsey, NJ rehousing was already open and available for immediate rehousing from a date prior to initial admittance,

(xvii) Ramsey, NJ rehousing from March 30, 2011 incorporated intense malodors in roommate hygiene for more than 18 months, other hostile environment living conditions, and no access to employment despite intense searches, including casual employment at local supermarket, while

(xviii) Illegal BRMT bioweapon and bioweapon delivery system was used for oxytocin boost in online fake romance and funds theft in 2014-2018,

(xix) Deprivation of Covid-19 vaccine access by technical computer hacks of computer and web site occurred in 149 failed attempts to secure vaccination appointment in 2020,

(xx) Dating website used to screen in specific individuals, including surreptitious media an police powers females, and form fraudulently manipulated interpersonal relationship with GIA, use of illegal BRMT bioweapon and bioweapon delivery system continued for, among other things, the specific purposes of (a) inflicting intermittent symptoms of erectile dysfunction and (b) to secure salacious and publicly humiliating videos of Lead Plaintiff with GIA,

(xxi) Retraumatization attempted through psychological duress and coercion as recycled in current Edgewater, NJ residence with uncertainty imposed by defendant USMS offsets of lease renewal date from Section 8 renewal dates in 2022-2024, after human trafficked yet again unwittingly to Edgewater, NJ, and into the middle of another national security investigation, this one of Senator Menendez, and two co-defendants who have offices 550 feet from Lead Plaintiff's residence.

O. The destruction of Lead Plaintiff's property rights summarized at paragraph 828D further evidences this involuntary servitude as a key element in the rights violations and associated-in-fact enterprise pattern of racketeering acts which are part of defendants' overall pattern of practice and elements of the entire complex sweep of adverse outcomes through

criminal acts of these defendants which have and do injure the Lead Plaintiff, all as perpetrated by defendant UNITED STATES and its co-conspirators during the Lead Plaintiff's professional career and marriages. Prior adverse outcomes are also evidenced at all other paragraphs of this complaint including, without limitation, paragraph 250-710. This form of involuntary servitude is pervasive and systematic, comprising at various times each and every aspect of human life and liberty which are the cornerstone unalienable rights alleged to be secured by government in our constitutional republic. In point of fact and actual practice clearly demonstrated by the abundant evidence, this government (defendant UNITED STATES) and its co-conspirators have and do engage in practices against human subjects which are directly comparable to the treatment of Dachau medical prisoners between 1942 and 1945, to and including torture (a direct comparison will be presented at trial), comparable to National Institutes of Health biomedical abuses of captive great apes prior to 2015 (a direct comparison will be presented at trial), and incorporate cruel and unusual treatment which federal courts have found to be Eighth Amendment violations against persons incarcerated after due process in US prisons (a direct comparison will be presented at trial).

P. Psychopathy has been specifically defined through 40 years of clinical research and is included in the definitive field manual DSM-5 of the American Psychiatric Association, to be presented in expert testimony at trial. A Psychology Today article reproduced below summarizes this condition and conduct which is evidenced in the institutional and individual misconduct and color of law crimes and abuses by, without limitation, defendant UNITED STATES, in particular CIA, FBI, USMS, described in this paragraph and throughout this complaint in paragraphs 250-710 (emphasis added below.)

[Intentionally left blank.]

"Psychopathy: A Clinical Diagnosis
The most dangerous antisocial personality disorder.

Psychopathy is an antisocial personality disorder that is highly correlated with crime and violence. The concept of psychopathy has been known for centuries but only in recent years has there been considerable research attention paid. In particular, Robert Hare, a prominent researcher in the field of criminal psychology, has led research efforts to develop a series of assessment tools to evaluate the personality traits and behaviors attributable to psychopaths.

Dr. Hare and his associates developed the Psychopathy Check List Revised (PCL-R) and its derivatives which provide a clinical assessment of the degree of psychopathy that an individual possesses.

Based on 40 years of intensive empirical research, the PCL-R has been established as a powerful tool for the assessment of this serious and dangerous personality disorder. Specific scoring criteria rate twenty separate items on a three-point scale (0, 1, 2) to determine the extent to which they apply to a given individual.

The instruments developed by Dr. Hare and his colleagues attempt to measure a distinct cluster of personality traits and socially deviant behaviors which fall into four factors: interpersonal, affective, lifestyle and antisocial.

The interpersonal traits include glibness, superficial charm, grandiosity, pathological lying and manipulation of others. The affective traits include a lack of remorse and/or guilt, shallow affect, lack of empathy and failure to accept responsibility. The lifestyle behaviors include stimulation-seeking behavior, impulsivity, irresponsibility, parasitic orientation and a lack of realistic life goals. Antisocial behaviors include poor behavioral controls, early childhood behavior problems, juvenile delinquency, revocation of conditional release and committing a variety of crimes……."

Excerpt Source:
https://www.psychologytoday.com/us/blog/wicked-deeds/201610/psychopathy-clinical-diagnosis

Q. The acts described herein and in the 1975 Senate Select Committee report on FBI and CIA are consistent with the findings of the 40 years of research above into criminal and other anti-social behaviors which comprise psychopathy. The findings from both those sources corroborate and are completely consistent with the direct experience of the Lead Plaintiff, and with the observed patterns of life experiences noted by Lead Plaintiff in the life paths of other

extended family members of this religious family and their other relatives and described herein (paragraphs 1-710, particularly 336-340, LPEE pages 237-271, 312, 6885-7466), with 45 years of scofflaw conduct related FISA Act, and (iv) with 15 years of PATRIOT Act Section 702 rights abuses, all at the hands of primary perpetrator defendant UNITED STATES, and its co-conspirator defendants (paragraphs 308, 320). Further evidence of this pattern of institutional and individual criminal and illegal scofflaw behavior under color of law will be identified through the discovery process

R. These plaintiffs have and do act in good faith in their exercise of their constitutional rights of free exercise of religion, and of all other rights; have and do faithfully serve their nation when called to duty; have and do engage in ordinary jobs, careers, commerce, and interstate commerce in a fair and reasonable manner; have and do conduct their lives in the manner expected of good citizens.

S. The proper constitutional role of government includes, without limitation, defendant UNITED STATES' direct and explicit duty to specifically and affirmatively to secure these plaintiffs' rights to free exercise of their religious beliefs including, without limitation, military service as conscientious objectors who serve without bearing arms when called into military service, and to establish justice which includes securing all their rights of free expression and action. These plaintiffs and their posterity, including the Lead Plaintiff, have instead been used as the involuntary servants of government (human guinea pigs and lab rats) in its pursuit of acts which are illegal under our Constitution, laws, and ratified treaties, by using these plaintiffs (i) as the subjects of illegal human medical experiments, which acts are specifically chargeable and indicatable as crimes, (ii) to sustain the cover-up of other of its own criminal acts against still other citizens exercising their rights, and (iii) as government's prey for entrapments and

incriminations, by setting upon them and engaging in coercion while those citizens conduct themselves in accordance with their religious beliefs and without harm or malice toward others.

T. These defendants, particularly defendant UNITED STATES as the original and perpetual perpetrator, fail the most basic test of the very purpose of government, “to secure these rights” (Declaration, 1776), by their continual coercion of these plaintiffs. They are unfit to exercise the police powers of our government.

U. In the case of the Lead Plaintiff’s own family of origin, which is representative of the experiences of this class of plaintiffs, these surreptitious coercive and forcible methods date to at least 1961, and almost certainly even earlier while in defendant ARMY miliary service during the Korean War. After Lead Plaintiff’s father Don’s early 1950s faithful service in defendant ARMY Medical Corps, Don was then human trafficked and coerced into moving his family by his employment in a defendant FBI cover company, Pacific Paper Products, Tacoma, WA, in service of defendant FBI as it (i) undercut the prices of legitimate businesses using funds appropriated by Congress to (ii) subsidize its losses on medical paper products sales at less than cost, to (iii) destroy medical x-ray evidence of its violent racist and anti-rights Cointelpro program operations in northern California in 1961-62 and in southern California in 1962-63 (paragraphs 403-416) using a “recycling” program to destroy this evidence for the stated purpose of recovering the silver in these x-ray films. Defendant FBI, through Pacific Paper Products, (iv) provided Lead Plaintiff’s unwitting father (a) a specific targeted list of medical facilities, presented to him as sales leads for specific follow-up, where Cointelpro victims had sought medical treatment for these underpriced medical paper products and (b) provided substantial commissions for the “recycling” of these x-ray films from these medical providers to (c) obstruct justice for those victims by destroying evidence of its own inculpation in violent criminal assaults on US persons. That tradition of the obstruction of justice to fraudulently conceal its

own illegal and violent methods against rights and against US persons by defendant UNITED STATES (including, without limitation, DOJ, FBI, USMS, CIA, ARMY, DOD) has and does continue into the present time, as well and expensively documented throughout this complaint.

V. Lead Plaintiff himself was first human trafficked to California from Washington state in Summer 1968 as an involuntary and unwitting human subject of illegal biomedical experiments at age 12 by defendant UNITED STATES (paragraph 417-418). This illegal human trafficking was conducted by Gary JACK acting for defendants ARMY and CIA which could have occurred as early as Summer 1967 at age 11, after various individuals described herein at paragraph 717 first appeared in Lead Plaintiff's sixth grade elementary school class at defendant FWSD's Lakeland Elementary School during the 1966-67 school year. These acts, violations, and injuries echo and repeat defendant UNITED STATES' departments and agencies' other criminal violations of constitutional rights in (a) defendant FBI's Cointelpro, in (b) defendant CIA's MKUltra, and by (c) Nazi doctors prosecuted in the Nuremberg Trials in 1946 -47 for illegal medical experimentation on human subjects without consent (LPEE pages 237-367, 6885-7466) and those secretly emigrated to the United States by defendant ARMY, other elements of defendant DOD, and the State Department in Operation Paperclip between 1945-1959, paragraph 358.

W. Lead Plaintiff worked for Larry Brewer, his father's cousin, at a grocery store in Federal Way, WA, from 1972-1974, wherein defendant FBI had a secret investment interest made through a "partner" who was actually an FBI agent posing for a time as its produce manager, while another FBI agent worked as a clerk in that store, while the grocery store was supplied by Associated Grocers, a Seattle, WA wholesale grocery cooperative which employed defendant WEISSMAN, then known as Lyle Whiteman. Defendant WEISSMAN also later ran Puget Consumers Cooperative where the Lead Plaintiff served for three years on the Board of

Trustees in the early 1980s while he was employed at still another illegal defendant USMS cover company Deloitte Seattle from 1979-1986, allegedly an office of an international accounting and consulting firm, as Deloitte Seattle supported illegal domestic and international espionage and intelligence operations of defendants FBI and CIA, (paragraphs 99K, 417-418, 449, 600F, 602).

X. Lead Plaintiff's uncle (paragraphs 10, 412, 413, 600B, Interline Exhibit 1) unwittingly worked in a shadow version of Banner Bank with an office in Bothell, WA, during a period when the Lead Plaintiff was employed by CNA, a cover company which, according to his CNA employer Larry Cook (defendant FAUCI), used that same shadow bank, Banner Bank Bothell, as its surreptitious funding source which laundered appropriated funds into CNA as subsidies for its on-going losses during its illegal spying and surveillance operations (to engage in widespread violations of *Fourth* Amendment rights) both before and during unwitting Lead Plaintiff's employment at CNA (paragraphs 457-461).

Y. Both Lead Plaintiff's own 11 year old sister, Sandra, and his cousin's 18 year old daughter, Audrey, were most probably murdered in 1970 and 2011 respectively, using extreme murderous medical malpractice in 1970 with a lethal salicylate (aspirin) drug overdose to Reye Syndrome masked by an opiod (codeine), and then in 2011 using coercive psychological and biochemical manipulations, during different stages of the field test of the illegal BRMT bioweapon and bioweapon delivery system tools of violence (paragraphs 803, 805). These specific murderous acts are consistent with other deadly experiences, including whistleblower Frank Olson in 1953 (paragraphs 359-363) as CIA's MKUltra LSD drugging, and FBI's Cointelpro illegal and violent wars on civil rights, targeted US persons in those times and places who were asserting their rights, their faiths, and their beliefs. These patterns of persistent criminal and illegal practices were very well investigated and documented by Congress in 1975 and during Vice President Rockefeller's 1977 Presidential Commission of MKUltra program

evidence which accidentally was not destroyed during defendant CIA's obstruction of justice by its destruction of program records in 1973 (LPEE pages 237-271, 6885-7466). Those same well-documented associated-in-fact enterprise patterns of racketeering acts, rights violations, and conspiracy repeat herein.

Z. This involuntary servitude has and does continue throughout the Lead Plaintiff's personal and work life and professional career from his collateral trafficking to California in 1961, through his first direct human trafficking in 1968, his first employment in 1972, to his last permitted employment in 2008, and since that time, as he has been unable to secure employment and all entrepreneurial efforts have been repeatedly stymied, coopted, and destroyed by defendant UNITED STATES, its departments and agencies, and its co-conspirators. By acts of human trafficking and frauds from 2008 to the present, defendant UNITED STATES has and does prohibit all employment and entrepreneurial activity from being freely undertaken and pursued by Lead Plaintiff, violating rights and costing the Lead Plaintiff further millions of dollars in lost direct personal compensation, in addition to defendants' prior periods of active control of direct compensation, of periods of unemployment and other deprivations, and thefts and frauds on his business enterprises, and personal, financial, real, and intangible property in their perpetual pattern of involuntary servitude including, without limitation, surreptitious employment, deprivation of alternative employment opportunities, secret co-investments, share ownership, and assigned embedded partners in his businesses, workplaces, and personal life (paragraphs 403-584) from 1968 as a minor child through first professional employments in 1977 and 1979, to the present time.

AA. In furtherance of this conspiracy, defendants have and do act in violation of federal statutes and the state laws of at least 44 states physically visited by Lead Plaintiff, and in

violation of international laws and treaties, all as perpetrated by defendant UNITED STATES and its defendant co-conspirators:

(i) pretexting and acts, violations, and injuries directed at Lead Plaintiff and other members of this class of plaintiffs; by defendant UNITED STATES' election in its illegal discretionary acts in (ii) permitting, enlisting, empowering, and/or enabling domestic and foreign fraudulent actors electronically screened in by defendants, (iii) permitting, enlisting, empowering, and/or enabling foreign intelligence services of countries pretexted and/or physically visited by Lead Plaintiff, and/or (iv) pretexting of false and misleading narratives regarding Lead Plaintiff to cause other discriminatory illegal acts targeting Lead Plaintiff, and/or other members of this class of plaintiffs, in violation of US law and of their own laws, and of any reasonable standard of practice, in

(a) their series of schemes, conspiracies, injuries, and deprivations of rights, and of (b) deprivations of Privileges and Immunities, including, without limitation, (b-i) Lead Plaintiff's rights to free, equal, and non-discriminatory access to acquire, possess, retain, and enjoy all forms of property, including those rights to same as guaranteed under ratified international treaties, and (b-ii) including such rights as they relate to employment, interstate commerce, and to closely held business entities. Defendants have and do injure the Lead Plaintiff and other members of the class by such deprivations of rights. Locations and particular details of many of these acts, violations, and injuries are unknown at the time of this complaint and subject to discovery.

AB. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant

UNITED STATES, its departments and agencies, and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	**Facts - Subcount Series**	**Subcount(s)**
600-603	NSEC National Security Pretexting and Entanglements	1-4
604-620	HEXP Illegal Human Experimentation	1-17
621-637	RGTS Individual Rights Violations and Conspiracies	1-17
639-693	RICO Racketeering	1-55
694-710	LTHL Lethality Attempts	1-17

[Intentionally left blank.]

821. CLAIMS FOR RELIEF - COUNT 21

Violations of Constitutional Rights Under the First, Fourth, Fifth, Eighth, Thirteenth, Fourteenth Amendments

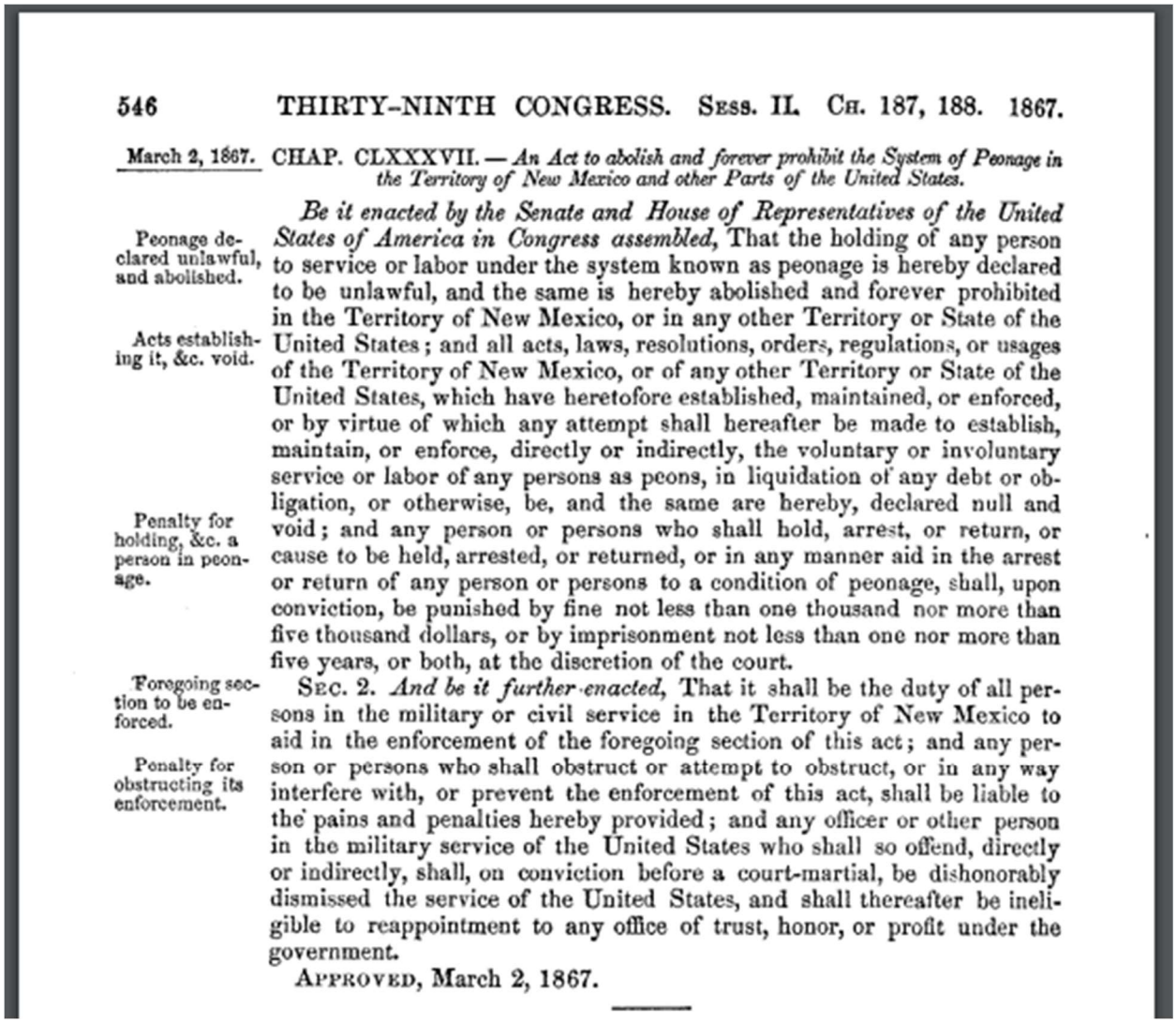
Peonage– Title 18 RICO

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. §§ 1581, 1961-1698,
Washington:	RCW §§ 9A.40.100
New Jersey:	NJ Stat §§ 2C:13-2, 2C:41-1 through 2C:41-6, 10:6-2
New York:	NA
California:	Cal Penal Code §§ 236, 236.1(a) Cal Labor Code §§ 2801, 2802 Cal Civil Code §§ 1708-1725
Massachusetts:	Mass Gen L ch 265 § 51
Arizona:	AZ Rev Stat § 13-1308
Texas:	TX Penal Code § 20A.02
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Paragraph 820C through AA and paragraph 822C and D are specifically incorporated by reference for their particular relevance to this paragraph 821. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph.

B. Defendants have and do plan, conspire, perpetrate and engage in violations of the Thirteenth Amendment which prohibits involuntary servitude, which includes peonage defined as holding of any person to service or labor. Enacted by the 39th Congress, the Peonage Act prohibits this form of involuntary servitude, as follows:

[Intentionally left blank.]



546 THIRTY-NINTH CONGRESS. SESS. II. CH. 187, 188. 1867.

March 2, 1867.

CHAP. CLXXXVII. — *An Act to abolish and forever prohibit the System of Peonage in the Territory of New Mexico and other Parts of the United States.*

Peonage declared unlawful, and abolished.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That the holding of any person to service or labor under the system known as peonage is hereby declared to be unlawful, and the same is hereby abolished and forever prohibited in the Territory of New Mexico, or in any other Territory or State of the United States;

Acts establishing it, &c. void.

and all acts, laws, resolutions, orders, regulations, or usages of the Territory of New Mexico, or of any other Territory or State of the United States, which have heretofore established, maintained, or enforced, or by virtue of which any attempt shall hereafter be made to establish, maintain, or enforce, directly or indirectly, the voluntary or involuntary service or labor of any persons as peons, in liquidation of any debt or obligation, or otherwise, be, and the same are hereby, declared null and void;

Penalty for holding, &c. a person in peonage.

and any person or persons who shall hold, arrest, or return, or cause to be held, arrested, or returned, or in any manner aid in the arrest or return of any person or persons to a condition of peonage, shall, upon conviction, be punished by fine not less than one thousand nor more than five thousand dollars, or by imprisonment not less than one nor more than five years, or both, at the discretion of the court.

Foregoing section to be enforced.

SEC. 2. *And be it further enacted*, That it shall be the duty of all persons in the military or civil service in the Territory of New Mexico to aid in the enforcement of the foregoing section of this act;

Penalty for obstructing its enforcement.

and any person or persons who shall obstruct or attempt to obstruct, or in any way interfere with, or prevent the enforcement of this act, shall be liable to the pains and penalties hereby provided; and any officer or other person in the military service of the United States who shall so offend, directly or indirectly, shall, on conviction before a court-martial, be dishonorably dismissed the service of the United States, and shall thereafter be ineligible to reappointment to any office of trust, honor, or profit under the government.

APPROVED, March 2, 1867.

C. Defendants have and do act in violation of the above referenced statutes throughout the Lead Plaintiff's personal and work life, and his education and professional career, from at least 1972 to the present. Peonage is "any form of wage labor, financial exploitation, coercive economic practice, or policy in which the victim or a laborer (peon) has little control over employment or economic conditions" (Source: Wikipedia). Defendant UNITED STATES, it departments and agencies and individual defendants therein, have and do engage in violations of the statutory prohibition on peonage 18 U.S.C. § 1581 by means of the abuse of law and legal process under color of law, through its abuse of police powers in the patterns of racketeering acts conducted by the associated-in-fact enterprise, and by discrimination in employment, which it

has and does perpetrate, both severally and jointly with other co-conspirator defendants. This illegal conduct meets and exceeds the legal definitions of involuntary servitude at 18 U.S.C. § 1584, of peonage at 18 U.S.C. § 1581, in both defendants' continuing conduct and their continuing obstructions of all efforts to terminate this unconstitutional condition imposed on these plaintiffs, of forced labor at 18 U.S.C. § 1589, is classified as serious harm under 18 U.S.C. § 1589(c)(2), as human trafficking at 18 U.S.C. § 1590, and is a severe form of human trafficking under 22 U.S.C. § 7102 (11) in the duration, scope, and extent of its illegal conduct against the Lead Plaintiff in 44 states and multiple foreign nations from 1968 to the present. Since defendant DOJ and its agencies have been and are directly involved in perpetrating this conduct, it has and does willfully refuse to investigate and charge these crimes and turns its blind eye to this conduct by its own agencies and by other co-conspirator defendants.

D**.** Defendant UNITED STATES and its co-conspirators have and do act, violate, and injure Lead Plaintiff and other members of this class of plaintiffs through, without limitation, surreptitious employment, assigned and dictated employment and compensation, direct and indirect control of the duration, location, and extent of employment periods, unemployment periods, deprivation of alternative employment opportunities, through systematic enterprise wreckings to total destruction, bankruptcy, and liquidation, thefts and frauds on business enterprises, flawed and fraudulent software implementations, surreptitious financial control, secret co-investments and share ownership, fraudulent banking and credit relationships, assignment of illegally embedded partners and employees in businesses, workplaces, interposition of fraudulent business opportunities, exclusion from actual business opportunities, delays and accelerations of contracts to exacerbate cash flow problems, fraudulent bid and performance bonding, deprivation of governmental small business benefits, and of other ordinary commercial benefits to which these enterprises were and are legally entitled.

E. Lead Plaintiff's career and all ability to earn independent income were ended by defendant UNITED STATES and its co-conspirator defendants in their own corrupt interests in June 2008, and which defendants have and do by their direct and indirect acts of frauds and other actions under color of law since that time, effectively prohibit all employment and entrepreneurial activities from being freely undertaken and pursued by Lead Plaintiff, thereby perpetuating defendants' associated-in-fact enterprise pattern of racketeering acts, violating rights, and costing the Lead Plaintiff further millions of dollars in lost direct personal compensation.

F. Defendant UNITED STATES and its co-conspirators have and do act, violate, and injure Lead Plaintiff and other members of this class of plaintiffs and their personal, psychological, emotional, and property interests through, without limitation, destruction of marital communities and families, entrapment attempts, physical and emotional injuries approaching death by illness, deep vein thrombosis, and direct illegal BRMT bioweapon and bioweapon delivery system hijacking, drive defendant UNITED STATES and its co-conspirators myriad attempts to inflict lethality remotely and through indirect means, through their acts, violations, and injuries directed at personal, financial, real, and intangible property from 1972 to present, as described at paragraph 828D, psychological and emotional through defendants' sequences of psychopathic coercion and violence described at paragraph 820E through F, through harassment while attempting to secure and through deprivations of personal benefits legally entitled such as unemployment compensation, government housing support, and health care.

H. Defendant UNITED STATES and co-conspirator defendants have and do act in systematic fraudulently concealed violations of constitutional rights by initially subjecting and then sustaining illegal searches by, without limitation, (i) embedding Lead Plaintiff into their

surreptitious cover employment; by (ii) assigning direct embedded minders into his personal life; by (iii) contriving and orchestrating female companions; by (iv) contriving and destroying a marital community; by (v) orchestrating, creating, and destroying a marital community; by (vi) controlling all professional employment from 1977; by (vii) controlling all periods of unemployment from 1978 to the present day; (viii) by controlling and destroying all efforts to engage in independent in-state, interstate, and international commerce; (ix) by subjecting him without consent to perpetual video and other intrusive surveillance; by (x) creating and sustaining false public narratives; by (xi) literally putting words in his mouth and thoughts in his mind using the illegal BRMT bioweapon and bioweapon delivery system. These acts, violations, and injuries are representative of those to this class of plaintiffs.

I. This pattern of peonage is part of these defendants' pattern of racketeering acts directed at the Lead Plaintiff in all matters of life through a system of fraud-based virtual restraints and assigned and designated circumstances to the Lead Plaintiff as specifically cited and described at paragraphs 419 through 534, together with and among other acts, injuries, and violations at the final subparagraph in this paragraph. In furtherance of this conspiracy, defendants have and do act in violation of federal statutes and the state laws of at least 44 states physically visited by Lead Plaintiff, and in violation of international laws and treaties, all as perpetrated by defendant UNITED STATES and its defendant co-conspirators:

(i) pretexting and acts, violations, and injuries directed at Lead Plaintiff and other members of this class of plaintiffs; by defendant UNITED STATES' election in its illegal discretionary acts in (ii) permitting, enlisting, empowering, and/or enabling domestic and foreign fraudulent actors electronically screened in by defendants, (iii) permitting, enlisting, empowering, and/or enabling foreign intelligence services of countries pretexted and/or physically visited by Lead Plaintiff, and/or (iv) pretexting of false and

misleading narratives regarding Lead Plaintiff to cause other discriminatory illegal acts targeting Lead Plaintiff, and/or other members of this class of plaintiffs, in violation of US law and of their own laws, and of any reasonable standard of practice, in

(a) their series of schemes, conspiracies, injuries, and deprivations of rights, and of (b) deprivations of Privileges and Immunities, including, without limitation, (b-i) Lead Plaintiff's rights to free, equal, and non-discriminatory access to acquire, possess, retain, and enjoy all forms of property, including those rights to same as guaranteed under ratified international treaties, and (b-ii) including such rights as they relate to employment, interstate commerce, and to closely held business entities. Defendants have and do injure the Lead Plaintiff and other members of the class by such deprivations of rights. Locations and particular details of many of these acts, violations, and injuries are unknown at the time of this complaint and subject to discovery.

J. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES, its departments and agencies, and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries

while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	Facts - Subcount Series	Subcount(s)
600-603	NSEC National Security Pretexting and Entanglements	1-4
604-613	HEXP Illegal Human Experimentation	1-17
623-629	RGTS Individual Rights Violations and Conspiracies	1-17
639-693	RICO Racketeering	1-55
	LTHL Lethality Attempts	1-17

822. CLAIMS FOR RELIEF - COUNT 22

Violations of Constitutional Rights Under the First, Fourth, Fifth, Eighth, Thirteenth, Fourteenth Amendments

Forced Labor– Title 18 RICO

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. §§ 1589, 1961-1968
Washington:	RCW §§ 9A.40.100
New Jersey:	NJ Stat §§ 2C:13-2, 2C:41-1 through 2C:41-6, 10:6-2
New York:	NA
California:	Cal Penal Code §§ 236, 236.1(a) Cal Labor Code §§ 2801, 2802 Cal Civil Code §§ 1708-1725
Massachusetts:	Mass Gen L ch 265 § 51
Arizona:	AZ Rev Stat § 13-1308
Texas:	TX Penal Code § 20A.02
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Paragraphs 820C through AA and paragraphs 821D through 821I are particularly incorporated herein for specific relevance to this paragraph 822. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph.

B. Defendants have and do plan, conspire, perpetrate and engage in the management and operation of an enterprise-in-fact system of forced labor by using virtual restraints and assigned and designated circumstances to the Lead Plaintiff in all matters of life through a system of fraud-based virtual restraints and assigned and designated circumstances to the Lead Plaintiff as specifically cited and described at paragraphs 419 through 534 together with and among other acts, injuries, and violations at the final subparagraph in this paragraph, both within and without the territory of the United States.

C. Defendant UNITED STATES, its departments and agencies, and individual co-conspirators, has and does engage in violations of the statutory prohibition on forced labor 18 U.S.C. § 1589(a)(3) by means of the abuse of law and legal process under color of law, through its abuse of police powers in the patterns of racketeering acts conducted by the associated-in-fact enterprise, which it has and does perpetrate, and has and does perpetuate both severally and jointly with other co-conspirator defendants. This illegal conduct meets and exceeds the legal definition of involuntary servitude at 18 U.S.C. § 1584, of peonage at 18 U.S.C. § 1581, of forced labor at 18 U.S.C. § 1589, is classified as serious harm under 18 U.S.C. § 1589(c)(2), as human trafficking at 18 U.S.C. § 1590, and is a severe form of human trafficking under 22 U.S.C. § 7102 (11) in the duration, scope, and extent of its illegal conduct against the Lead Plaintiff in 44 states and multiple foreign nations from 1968 to the present. Since defendant DOJ and its agencies have been and are directly involved in perpetrating this conduct, it has and does willfully refuse to investigate and charge these crimes and turns its blind eye to this conduct by its own agencies and by other co-conspirator defendants.

D. This forced labor conduct explicitly incorporates, without limitation, the duress and psychological coercion to terrorization and suicide ideation, intermixed with lethality attempts as imposed on Lead Plaintiff primarily by defendant UNITED STATES, in conspiracy at various

times and places with co-defendants including, without limitation, defendants ROSENBERG, SUMMERS, CHALOM, WEISSMAN, MELBER, and currently unknown others, through their repeated psychopathic acts, as that term is medically defined through forty years of clinical research at paragraphs 820N through 820Q, of coercion and duress by in the sequences of psychological and illegal BRMT bioweapon and bioweapon delivery system brain chemistry hijacking and torture, and psychological coercion imposed during repeated traumas including, without limitation, programmed divorces, human trafficking, and homelessness, mixed with illegal BRMT bioweapon and bioweapon delivery system illegal human subject medical experiments without consent and bioweapon deployment from 1988 to the present during the sequences of psychopathic coercion and violence described at paragraphs 820E through 820F.

E. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate

frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	Facts - Subcount Series	Subcount(s)
600-603	NSEC National Security Pretexting and Entanglements	1-4
604-613	HEXP Illegal Human Experimentation	1-10
623-629	RGTS Individual Rights Violations and Conspiracies	3-9
639-693	RICO Racketeering	1-55
694-710	LTHL Lethality Attempts	1-17

823. CLAIMS FOR RELIEF - COUNT 23

Violations of Constitutional Rights Under the First, Third, Fourth, Fifth, Eighth, Thirteenth, Fourteenth Amendments

Sexual Abuse – Title 42 Civil Rights

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. §§ 250, 42 U.S.C. §§ 1981, 1985
Washington:	RCW §§ 9A.36.011(1)c, 9A.36.021(1)d, f, 9A.40.115
New Jersey:	NJ Stat §§ 2C:14-9, 10:6-2
New York:	New York Penal L. § 190.25
California:	NA
Massachusetts:	NA
Arizona:	NA
Texas:	NA
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph.

B. Defendants have and do plan, conspire, perpetrate and engage in their series of acts to screen-in and screen-out potential sexual partners to the Lead Plaintiff, among other acts, injuries, and violations at the final subparagraph in this paragraph.

C. This sexual abuse at paragraph 823 specifically includes defendants DOJ, FBI, USMS, and CIA in their election to orchestrate fraudulent relationships and to develop false public and, at times salacious, narratives about the Lead Plaintiff, using defendant MATCH GROUP websites either administered for their benefit or spoofed by them, between Lead Plaintiff and MODDERMAN in 2008, paragraph 611 HEXP-8, which included episodes of illegal BRMT sexual abuse by erectile dysfunction administered in accordance with a plan coordinated between defendant CIA or elements of defendant DOJ, and defendants MODDERMAN in 2008 at paragraph 611 HEXP-8, and GIA in 2019-2020 at paragraph 613 HEXP-10, which events and their public availability were intended to publicly humiliate, smear, and defame Lead Plaintiff as an element of defendants' criminal intent and conspiracy to construct a defamatory narrative about Lead Plaintiff, and to prevent him from pursuing his own interests which have and do contradict that corrupt defamatory and salacious narrative.

D. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and

friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	Facts - Subcount Series	Subcount(s)
	NSEC National Security Pretexting and Entanglements	
610, 611, 613, 614	HEXP Illegal Human Experimentation	7, 8, 10, 11
	RGTS Individual Rights Violations and Conspiracies	
	RICO Racketeering	
	LTHL Lethality Attempts	

824. CLAIMS FOR RELIEF - COUNT 24

Violations of Constitutional Rights Under the First, Fourth, Eighth, Thirteenth, Fourteenth Amendments

Frauds - Mail

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. §§ 1341, 1961-1968
Washington:	RCW § 9A.60.040
New Jersey:	NJ Stat §§ 2C:20-4, 2C:41-1 through 2C:41-6, 10:6-2
New York:	NA
California:	Cal Civil Code §§ 1708-1725
Massachusetts:	Mass Gen L ch 151b § 4, ch 265 § 51
Arizona:	NA
Texas:	NA
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph. as well as state statutes in all originating locations, many of which are unknown at the time of this Complaint and will be available upon discovery,

B. Defendants have and do plan, conspire, perpetrate and engage in frauds and patterns of frauds through intentional and negligent misrepresentations which harm these plaintiffs which are claimed as legal acts under color of law by police powers, and claimed as legal acts of press freedom. These frauds in fact have been and are perpetrated for the purposes of perpetuating plaintiffs' involuntary servitude, sustaining fraudulent concealment, evading all accountability for criminal and illegal acts in violations of human, constitutional, civil rights, and statutory and common law, and to turn a blind eye to obvious wrongs and neglect to prevent for purposes of evasion, by deliberately inculpating members of the press in this long-running sequence of associated-in-fact enterprise pattern of racketeering acts for the purpose of inculpating members of the media as principals, actors, and accomplices to the conspiracy, in which some have and do engage as so identified as co-conspirator defendants in an associated-in-fact pattern of racketeering acts, rights violations, and conspiracy herein. These frauds, schemes, attempts, and conspiracies incorporate predicate acts and frauds in simple and complex patterns of racketeering acts by this associated-in-fact enterprise, wherein these governmental defendants have and do exercise control and constraints on the parties who are allowed to participate, by their color of law abuses of rights in their exercise of police powers, which comprises a systematic and durable scheme of abuses of rights under color of law. This associated-in-fact enterprise pattern of racketeering acts, rights violations, and conspiracy is primarily but not exclusively controlled by defendant UNITED STATES, its departments and agencies, for its own corrupt and durable purposes including, without limitation, fraudulently concealing violations of constitutional rights, of criminal law in its associated-in-fact enterprise pattern of racketeering acts with co-conspirator defendants, and the overall conspiracy through which it has and does act against the constitutional rights and interests of these plaintiffs.

C. These frauds are pled with particularly herein using a layer cake approach to cross reference the specific statutory violations to the particular acts, violations, injuries which comprise the fraud, conspiracy, or attempt to defraud. This layered approach cross references and relates (i) the statutory method used (including, without limitation, mail, wire, email, computer, access device) to (ii) the general form of these frauds (five categories, some with subcategories), thereby relating each relevant subcount among the 110 subcounts herein at paragraphs 600-710, and which direct each defendant to (iii) the specific evidence of the set of acts in the fraudulent scheme, conspiracy, or attempt to defraud so each defendant named can provide a legally responsive answer. These 110 subcounts are a representative listing, they are not an exhaustive recitation of each and every act, violation, and injury to the Lead Plaintiff. These 110 subcounts are necessarily representative of the forms of frauds against other plaintiffs of this class, given the current lack of specific evidence and of the particularity required in pleading under F. R. Civ. P. Rule 9(b), as that Rule relates to other members of the class of plaintiffs as of this filing, which are subject to discovery.

D. The 110 subcounts at paragraphs 600-710 are generally organized into (ii) five categories, some with subcategories, presented in these categories for convenience of organization not to make specific legal arguments, as follows:

(i) *National Security Pretexting, Frauds, And Entanglements* (NSEC series) – principally used to pretext, entangle, and attempt to entrap plaintiffs and to sustain their involuntary servitude through color of law abuse of the state secret privilege.

(ii) *Illegal Human Experimentation, BRMT Brain Hijacking Abuses* (HEXP series)– principally used to illegally experiment on these plaintiff victims as human subjects without their consent, and to research, develop, test, and deploy the illegal bioweapon and bioweapon delivery system through its development cycles and technological

advances from crude local use by hijacking basic human hormones in 1968, to the more modern extreme forms of hijackings of bodily functions, thought, and action and thence through fully remote illegal bioweapon deployment and abuses. These illegal experiments on unwitting human subjects without consent, used to develop, test, and deploy this internationally prohibited device, illegal under federal law, have and do continue in a manner similar to (a) the systematic abuses of Dachau prisoners; to (b) the abuse of great apes in cruel medical experiments discontinued on primates since 2015 by the federal government, but continued against these unwitting and unwilling plaintiffs as involuntary human subjects; and to (c) military weapons acceptance tests done on military ranges to accurately replicate the field conditions in which those physical weapons are used. The illegal BRMT bioweapon and bioweapon delivery system is a bioweapon system illegally developed and deployed against individual human targets, in violation of 18 U.S.C. § 175 and the ratified 1972 *Bioweapons Treaty.*

(iii) *Individual Rights Violations* (RGTS series) – principally used to sustain surreptitious involuntary servitude as the means of control of life circumstances for illegal biological and coercive psychological hijackings of these human subject plaintiffs to support illegal BRMT bioweapon and bioweapon delivery system research, development, test, and deployment in field conditions to fraudulently conceal the illegal program and to field test its deployment as a weapon in normal field conditions, similar to methods used in the field testing and acceptance of other weapons on ranges specifically intended for those tests, including through actual patterns of injury to plaintiff victims. Incidents of testing to death and attempted deaths are described at the lethality series below and in paragraphs 803 and 805. The three subcategories are:

a. Entrapments, Illegal Searches, and Willful Blindness

b. Direct Interferences in Personal and Intimate Relationships

c. Hacking, Harassments, Disinformation, Abuse of Official Records

(iv) *Racketeering* (RICO subcount) – principally used to sustain vocational control of income, employment, conditions of employment, and of the ability to form and control private enterprises affecting and engaged in direct and indirectly federally funded in-state commerce, in interstate commerce, and in international commerce; and to sustain control of the accumulation and use of property; all planned and perpetrated to control the life circumstances and psychological well-being of these plaintiff victims for their involuntary servitude to perpetrate and sustain illegal manipulations of rights and their life circumstances as human test subjects to illegally abuse these plaintiff victims and to research, develop, test, and deploy the illegal BRMT bioweapon and bioweapon delivery system through its development cycles and technological advance; to support and sustain other illegal domestic spying and surveillance operations of denfednat UNITED STATES, its departments and agencies, under commercial covers; to support international commercial cover espionage operations; and to perpetuate the color of law abuse of the state secret privilege and color of law abuse of police powers. The two principal subcategories are acts targeted directly at personal property and at small businesses and the further subcategories are as follows:

a. Racketeering – Personal

i. Thefts and Takings Targeted at Personal Assets

ii. Personal Color of Law Entrapment Attempts

b. Racketeering – Targeting Small Business and Enterprise

i. Thefts and Takings

ii. Fraudulent Financings

iii. Fraudulent Sales Leads

iv. Dishonest Professional Services

v. Fraudulent Production Asset Sales

(v) *Lethality Attempts* (LETHL series) - principally used to research and field test the effectiveness of methods of violence, severe injury and lethality (death), using actual field tests, events and circumstances specifically contrived for those purposes as described in each of the 17 subcounts (paragraphs), including various separate incidents described at the subcounts, including some subcounts which contain multiple incidents of the same pattern. These incidents are also used, as are other illegal BRMT bioweapon and bioweapon delivery system hijackings, to psychologically and biochemically shape plaintiff victim behaviors and to sustain psychological and behavioral control through threats of violence and injuries to the test subject which can occur at any time in any circumstance which the defendants deem useful in the psychological terrorization of the specific plaintiff victim, either as an isolated event or in conjunction with their coercive psychological operations in the environment.

E. Each of these 110 subcounts at paragraphs 600-710 particularly incorporates the specific set of acts known to be used in the fraudulent scheme, conspiracy, or attempt to defraud. The exact nature, scope, and extent of defendants' acts, violations, and injuries using the specific communications and documentation required to prove the fraud are set out; known defendants are specifically identified; unknown defendants using cover and fraudulent identities are also identified as they are known to the Lead Plaintiff until their true underlying identity can be determined through discovery. Many of these 110 subcounts incorporate extensive, multi-layered, and durable patterns of frauds by multiple defendants acting both undercover and in entangled ways which require discovery to set forth with clarity and therefore must be initially

presented with curated underlying evidence, so these defendant can provide legally responsive initial answers to this complaint and its complex pattern of durable frauds and rights violations against these plaintiffs fraudulently concealed over many decades of color of law abuse of the state secrets privilege and other corrupt abuses of police powers.

F. It is generally impossible for these plaintiffs to directly discern the specific underlying identity of the particular defendants perpetrating and permitting the perpetrations of the specific frauds given (a) the pervasive presence of entangled undercover police powers departments and agencies, and (b) of the particular press, media, and entertainment entities and individuals who have permitted access to this specifically discriminatory and gated access environment through the pervasive surreptitious constraints placed upon the Lead Plaintiff, primarily by defendant UNITED STATES in its own corrupt interests and in the interests of certain current and former government officials, whether or not known and named herein. Defendant UNITED STATES routinely has and does use human trafficking, electronic control of access, hijackings (forcible takeovers) by its operation of the illegal BRMT bioweapon and bioweapon delivery system, imposed penury, peonage, and other surreptitious means, as described throughout this complaint, to exercise pervasive control and to direct the acts, places, circumstances, and times of access of the Lead Plaintiff to all variety of ordinary acts of human beings and persons who are supposedly free citizens of the United States with freedoms and due process rights, but are in fact involuntary servants, free in name only not in form or substance, due to its pervasive control.

G. Defendants have and do deploy a variety of surreptitious methods and artifices as they conduct, act as accomplices, perform acts as accessories, and aid and abet these frauds. Specific identifications as to roles and relationships among these defendants regarding particular frauds and patterns of frauds, conspiracies, and attempts to defraud require discovery against these defendants. The statutory forms of these frauds, attempts, and conspiracies, whether personally

conducted using direct interaction, or by another means such as mail, wire, email, computers, access devices, or using some blend of these forms, is related in the underlying evidence which forms the base layer of evidence in each of the 110 subcounts described above, which evidence is specifically referenced in the narrative and/or table included at each claim for relief herein.

H. Defendants have and do act in violation of federal statutes 18 U.S.C. §§ 1341, 1961-1968, as well as state statutes in all originating locations, many of which are unknown at the time of this Complaint and will be available upon discovery, in their series of fraudulent checks and other documents mailed to the Lead Plaintiff, and in their interceptions of mail to others, among other acts, injuries, and violations at the final subparagraph in this paragraph, both within and without the territory of these states and of the United States.

I. Under 18 USC § 1962(c) (emphasis added):

> "It shall be unlawful for any person employed by or associated with any enterprise engaged in, or the activities of which affect, interstate or foreign commerce, to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity or collection of unlawful debt."

Under 18 USC § 1961(5) (emphasis added):

> "pattern of racketeering activity" requires at least two acts of racketeering activity, one of which occurred after the effective date of this chapter and the last of which occurred within ten years (excluding any period of imprisonment) after the commission of a prior act of racketeering activity;"

J. Defendant UNITED STATES has and does engage with its co-conspirator defendants to affect interstate commerce through this associated-in-fact enterprise and the pattern of racketeering acts conducted by these various defendants in their shared corrupt enterprise and conspiracy through their collective and shared responsibilities for various elements of this pattern of racketeering activity including, without limitation, the frauds described in this specific claim and all other claims against these defendants.

K. The mail fraud statute 18 USC § 1341 states (emphasis added):

> Whoever, having devised or intending to devise any scheme or artifice to defraud, or for obtaining money or property ..... places in places in any post office or authorized depository for mail matter, any matter or thing whatever to be sent or delivered by..... shall be fined under this title or imprisoned....."

Having "devised or intending to devise any scheme or artifice to defraud" which "affects interstate commerce" is alone sufficient to meet the statutory test at 18 USC 1962(c), no further benefit from the defendants' pattern of racketeering activity is required. A scheme or artifice to defraud is defined as:

> "Defraud: To make a Misrepresentation of an existing material fact, knowing it to be false or making it recklessly without regard to whether it is true or false, intending for someone to rely on the misrepresentation and under circumstances in which such person does rely on it to his or her damage. To practice Fraud; to cheat or trick. To deprive a person of property or any interest, estate, or right by fraud, deceit, or artifice."
>
> *Source:* https://legal-dictionary.thefreedictionary.com/defraud

And at 18 U.S.C. § 1346 includes, without limitation (emphasis added):

> "For the purposes of this chapter, the term "scheme or artifice to defraud" includes a scheme or artifice to deprive another of the intangible right of honest services."

L. This long-running scheme to defraud, which has and does incorporate dishonest professional services from defendant UNITED STATES and other defendants including, without limitation, other police powers defendants, directly affects interstate commerce, thus meeting the specific statutory tests of racketeering activity using schemes and artifices to defraud and patterns of frauds required under 18 U.S.C. § 1962(c) and 18 USC §§ 1341-1351. In addition to meeting this explicit statutory test, which is alone sufficient to meet the burden of proof as to the purpose of this conspiracy, this pattern of racketeering activity further benefits defendant UNITED STATES and co-conspirator defendants by driving direct and indirect economic benefits for these co-conspirators in their associated-in-fact enterprise, as they have and do share

common purposes and these various direct and indirect economic benefits, from its perpetuation and fraudulent concealment including, without limitation, the specific benefits described at paragraphs 801 and 803.

M. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	**Facts - Subcount Series**	**Subcount(s)**
600	NSEC National Security Pretexting and Entanglements	1
	HEXP Illegal Human Experimentation	
622, 623, 624, 627, 631, 637	RGTS Individual Rights Violations and Conspiracies	2, 3, 4, 7, 11, 17

639, 640, 641, 645, 649, 650, 653	RICO Racketeering	1, 2, 3, 7, 11, 12, 15
	LTHL Lethality Attempts	

N. These frauds are pled with particularity in compliance with F. R. Civ. P. Rule 9(b), using the layer cake method described at paragraphs 593-599, since it is not possible for these plaintiffs to accurately determine the specific underlying identities of many of the defendant parties who were directly involved in the acts, violations, and injuries, due to defendant UNITED STATES' pervasive control of plaintiffs' places and manner of residence, employment, enterprise, income and benefits, and relationships. Many of these acts, violations, and injuries were perpetrated in person and using electronic and other communications by undercover police powers personnel and entities concealing their personnel and operations, and by their agents and others they permitted special access including, without limitation press, media, entertainment, and privileged persons, wherein the actual identities of these defendants cannot reasonably be expected to be known by these plaintiffs absent legally responsive answers and discovery from these defendants, as discussed at paragraphs 90-114. Other frauds were perpetrated by defendants who were permitted to enter this pervasively controlled environment without their own direct knowledge that they were entering, as part of police powers defendants' color of law conspiracy to attempt to inculpate these plaintiffs and those defendants simultaneously for purposes of entrapping both parties, and, as result, the frauds are the responsibility of both these defendants' own acts, the related fraudulent concealments, and the neglect to protect from known bad actors in the bad faith practices of police powers defendants.

Elements of Fraud	Associated-In-Fact Pattern of Racketeering Acts Used By Defendants To Construct And Conduct Fraud
Defendant(s) fraudulent act(s)	Defendants named at paragraph 799
(1) material representation - what;	Obstructed delivery of mail, and sent false and fraudulent mail to induce acts and services provided in good faith by plaintiffs,

	as described in the aforementioned paragraphs 600, 622, 623, 624, 627, 631, 637, 639, 640, 641, 645, 649, 650, 653
(2) the representation was false - how;	Defendants repetitively deprived plaintiffs of constitutionally guaranteed rights to free and fair access to employment opportunities, products, services and/or honest services in interstate commerce under federal law and in-state commerce under state law
(3) the representation was known to be false or was recklessly made – why known;	Mail was physically obstructed, diverted, modified, or delayed from delivery by its interception in violation of federal law depriving plaintiffs of constitutionally guaranteed honest services from government and/or private mail carriers
(4) the representation was intended to induce the plaintiff to act - toward what act;	Plaintiffs were given to believe that services would be rendered securely and honestly so they took no other actions to protect their rights to free and fair access to other methods of securing these employment opportunities, products, services, and/or honest professional services
(5) the plaintiff relied on the misrepresentation - form of reliance;	Plaintiffs acted in good faith in the sincere belief that services would be rendered the same as for all other persons
(6) the plaintiff was damaged as a result - how	Plaintiffs were deprived of rights to free market employment or honest services from persons and entities they would otherwise be able to access, and damaged by the loss of opportunity, income, added costs, and deprivations of timely access to desired products and services resulting from defendant illegal obstruction of their legal rights in all forms and amounts of damages to be proven at trial

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825. CLAIMS FOR RELIEF - COUNT 25

Violations of Constitutional Rights Under the First, Fourth, Eighth, Thirteenth, Fourteenth Amendments

Frauds – Wire

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. §§ 1341, 1343, 1961-1968
Washington:	RCW §§ 9A.60.040
New Jersey:	NJ Stat §§ 2C:20-4, 2C:20-8, 2C:41-1 through 2C:41-6, 10:6-2
New York:	New York Penal L. §§ 190.05, 190.25, 190.60, 460.00 through 460.80
California:	Cal Civil Code §§ 1708-1725
Massachusetts:	Mass Gen L ch 151b § 4, ch 265 § 51
Arizona:	AZ Rev Stat § 13-2310 through 2312
Texas:	TX Penal Code §§ 32.01 through 32.03, 32.42, 71.02
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs, specifically including paragraph 824 wherein both the satisfaction of the statutory test, and the further benefits to these defendant of their patterns of frauds, racketeering activity affecting interstate commerce, is described. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph. as well as state statutes in all originating locations, many of which are unknown at the time of this complaint and will be available upon discovery.

B. Defendants have and do plan, conspire, perpetrate and engage in wire frauds in their series of emails which contain false and misleading content and/or personation both to the Lead Plaintiff, and falsely labeled as from the Lead Plaintiff, and as blocked, delayed, or otherwise obstructed to the Lead Plaintiff and/or authentic recipients, among other acts, injuries, and violations at the final subparagraph in this paragraph, both within and without the territory of the United States.

C. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	**Facts - Subcount Series**	**Subcount(s)**
600-603	NSEC National Security Pretexting and Entanglements	1-4
607, 608, 610-616, 618-620	HEXP Illegal Human Experimentation	4, 5, 7-13, 15-17
622-625, 627, 629, 631-637	RGTS Individual Rights Violations and Conspiracies	2-5, 7, 9, 11-17
639-693	RICO Racketeering	1-55
700-702, 704, 706, 710	LTHL Lethality Attempts	7-9, 11, 13-17

D. These frauds are pleaded with particularity in compliance with F. R. Civ. P. Rule 9(b) using the layer cake method described at paragraphs 593-599 since it is not possible for these plaintiffs to accurately determine the specific underlying identities of many of the defendant parties who were directly involved in the acts, violations, and injuries, due to defendant UNITED STATES' pervasive control of plaintiffs' places and manner of residence, employment, enterprise, income and benefits, and relationships. Many of these acts, violations, and injuries were perpetrated in person and using electronic and other communications by undercover police powers personnel and entities concealing their personnel and operations, and by their agents and others they permitted special access including, without limitation press, media, entertainment, and privileged persons, wherein the actual identities of these defendants cannot reasonably be expected to be known by these plaintiffs absent legally responsive answers and discovery from these defendants, as discussed at paragraphs 90-114. Other frauds were perpetrated by defendants who were permitted to enter this pervasively controlled environment without their own direct knowledge that they were entering, as part of police powers defendants' color of law conspiracy to attempt to inculpate these plaintiffs and those defendants simultaneously for purposes of entrapping both parties, and, as result, the frauds are the responsibility of both these defendants' own acts, the related fraudulent concealments, and the neglect to protect from known bad actors in the bad faith practices of police powers defendants.

Elements of Fraud	Associated-In-Fact Pattern of Racketeering Acts Used By Defendants To Construct And Conduct Fraud
Defendant(s) fraudulent act(s)	Defendants named at paragraph 799
(1) material representation - what;	Obstructed delivery of correct and accurate electronic mail and provided false and deceptive emails, sent false and fraudulent emails to induce acts and services provided in good faith by plaintiffs, and engaged in electronic banking and financial services in false and fraudulent promises and acts related to goods, services, and honest services as described in the aforementioned paragraphs 600-603, 607, 608, 610-616, 618-

	620, 622-625, 627, 629, 631-637, 639-693, 700-702, 704, 706, 710
(2) the representation was false - how;	Defendants repetitively deprived plaintiffs of constitutionally guaranteed rights to free and fair access to employment opportunities, products, services, and/or honest services in interstate commerce under federal law and in-state commerce under state law
(3) the representation was known to be false or was recklessly made – why known;	Wireline communications (including wireless communications which use wirelines for long-haul transmission) and/or transactions were physically obstructed, diverted, and/or delayed from delivery by interception and/or modification in violation of federal law depriving plaintiffs of constitutionally guaranteed secure and honest services when using wireline services
(4) the representation was intended to induce the plaintiff to act - toward what act;	Plaintiffs were given to believe that services would be rendered securely and honestly so they took no other actions to protect their rights to free and fair access to other methods of securing these employment opportunities, products, services, and/or honest services
(5) the plaintiff relied on the misrepresentation - form of reliance;	Plaintiffs acted in good faith in the sincere belief that services would be rendered the same as for all other persons
(6) the plaintiff was damaged as a result - how	Plaintiffs were deprived of rights to free market employment, products, services, and/or honest services from persons and entities they would otherwise be able to access, and damaged by the loss of opportunity, income, added costs, and deprivations of timely access to desired products and services resulting from defendant illegal obstruction of their legal rights in all forms and amounts of damages to be proven at trial

826. CLAIMS FOR RELIEF - COUNT 26

Violations of Constitutional Rights Under the First, Thirteenth, Fourteenth Amendments

Frauds – Computer Access Devices

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. §§ 1341, 1343, 1961-1968
Washington:	RCW § 9A.60.040
New Jersey:	NJ Stat §§ 2C:20-4, 2C:41-1 through 2C:41-6, 10:6-2
New York:	New York Penal L. §§ 190.75, 460.00 through 460.80
California:	Cal Civil Code §§ 1708-1725
Massachusetts:	NA
Arizona:	NA
Texas:	NA
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs, specifically including paragraph 824 wherein both the satisfaction of the statutory test, and the further benefits to these defendant of their patterns of frauds, racketeering activity affecting interstate commerce, is described. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph. as well as state statutes in all originating locations, many of which are unknown at the time of this complaint and will be available upon discovery,

B. Defendants have and do plan, conspire, perpetrate and engage in their series of fraudulent bank and other payment system wires by and between those defendants and the Lead Plaintiff, among other acts, injuries, and violations at the final subparagraph in this paragraph, both within and without the territory of the United States.

C. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and

friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	Facts - Subcount Series	Subcount(s)
600-603	NSEC National Security Pretexting and Entanglements	1-4
608-616	HEXP Illegal Human Experimentation	5-13
622, 635, 636	RGTS Individual Rights Violations and Conspiracies	2, 15, 16
639-693	RICO Racketeering	1-55
704	LTHL Lethality Attempts	11

D. These frauds are pleaded with particularity in compliance with F. R. Civ. P. Rule 9(b) using the layer cake method described at paragraphs 593-599 since it is not possible for these plaintiffs to accurately determine the specific underlying identities of many of the defendant parties who were directly involved in the acts, violations, and injuries, due to defendant UNITED STATES' pervasive control of plaintiffs' places and manner of residence, employment, enterprise, income and benefits, and relationships. Many of these acts, violations, and injuries were perpetrated in person and using electronic and other communications by undercover police powers personnel and entities concealing their personnel and operations, and by their agents and others they permitted special access including, without limitation press, media, entertainment, and privileged persons, wherein the actual identities of these defendants cannot reasonably be expected to be known by these plaintiffs absent legally responsive answers and discovery from these defendants, as discussed at paragraphs 90-114. Other frauds were perpetrated by defendants who were permitted to enter this pervasively controlled environment without their own direct knowledge that they were entering, as part of police powers defendants' color of law conspiracy to attempt to inculpate these plaintiffs and those defendants simultaneously for

purposes of entrapping both parties, and, as result, the frauds are the responsibility of both these defendants' own acts, the related fraudulent concealments, and the neglect to protect from known bad actors in the bad faith practices of police powers defendants.

Elements of Fraud	Associated-In-Fact Pattern of Racketeering Acts Used By Defendants To Construct And Conduct Fraud
Defendant(s) fraudulent act(s)	Defendants named at paragraph 799
(1) material representation - what;	Misused, abused, modified, and interfered with plaintiff uses of computer access devices through technical hacks during transactions to obstruct those transactions and the delivery of correct and accurate products and services, and engaged in electronic banking and financial services in false and fraudulent acts related to goods, services, and honest services as described in the aforementioned paragraphs 600-603, 608-616, 622, 635, 636, 639-693, 704, when using payment cards, and/or during plaintiff use of UPC-A barcodes in retail stores for the purpose of fraudulently inducing shoplifting entrapment
(2) the representation was false - how;	Defendants repetitively deprived plaintiffs of constitutionally guaranteed rights to free and fair access to employment opportunities, products, services, and/or honest services in interstate commerce under federal law and in-state commerce under state law
(3) the representation was known to be false or was recklessly made – why known;	Wireless and wireline computer access device communications and/or transactions were technically obstructed, diverted, and/or delayed from delivery by interception and/or modification in violation of federal law depriving plaintiffs of constitutionally guaranteed secure and honest services when using wireless proximity and wireline computer access devices
(4) the representation was intended to induce the plaintiff to act - toward what act;	Plaintiffs were given to believe that services would be rendered securely and honestly so they took no other actions to protect their rights to free and fair access to other methods of securing these employment opportunities, products, services, and/or honest services
(5) the plaintiff relied on the misrepresentation - form of reliance;	Plaintiffs acted in good faith in the sincere belief that services would be rendered the same as for all other persons
(6) the plaintiff was damaged as a result - how	Plaintiffs were deprived of rights to free market employment, products, services, and/or honest services from persons and entities they would otherwise be able to access, and damaged by the loss of opportunity, income, added costs, and deprivations of timely access to desired products and services resulting from defendant illegal obstruction of their legal rights in all forms and amounts of damages to be proven at trial

827. CLAIMS FOR RELIEF - COUNT 27

Violations of Constitutional Rights Under the First, Fourth, Fifth, Thirteenth, Fourteenth Amendments

Frauds - Computers

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. §§ 1030, 1961-1968
Washington:	RCW § 9A.60.040
New Jersey:	NJ Stat §§ 2C:20-4, 2C:20-8, 2C:41-1 through 2C:41-6, 10:6-2
New York:	NA
California:	Cal Civil Code §§ 1708-1725
Massachusetts:	Mass Gen L ch 151b § 4, ch 265 § 51
Arizona:	AZ Rev Stat § 13-2310 through 2312
Texas:	NA
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs, specifically including paragraph 824 wherein both the satisfaction of the statutory test, and the further benefits to these defendant of their patterns of frauds, racketeering activity affecting interstate commerce, is described. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph. as well as state statutes in all originating locations, many of which are unknown at the time of this Complaint and will be available upon discovery,

B. Defendants have and do plan, conspire, perpetrate and engage in their series of fraudulent transactions, website hacking and spoofing for financial frauds, transactions, communications, and other purposes to the Lead Plaintiff, among other acts, injuries, and violations at the final subparagraph in this paragraph, both within and without the territory of the United States.

C. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful

blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	**Facts - Subcount Series**	**Subcount(s)**
600-603	NSEC National Security Pretexting and Entanglements	1-4
604-619	HEXP Illegal Human Experimentation	1-16
622-637	RGTS Individual Rights Violations and Conspiracies	2-17
639-693	RICO Racketeering	1-55
694-710	LTHL Lethality Attempts	1-17

D. These frauds are pleaded with particularity in compliance with F. R. Civ. P. Rule 9(b) using the layer cake method described at paragraphs 593-599 since it is not possible for these plaintiffs to accurately determine the specific underlying identities of many of the defendant parties who were directly involved in the acts, violations, and injuries, due to defendant UNITED STATES' pervasive control of plaintiffs' places and manner of residence, employment,

enterprise, income and benefits, and relationships. Many of these acts, violations, and injuries were perpetrated in person and using electronic and other communications by undercover police powers personnel and entities concealing their personnel and operations, and by their agents and others they permitted special access including, without limitation press, media, entertainment, and privileged persons, wherein the actual identities of these defendants cannot reasonably be expected to be known by these plaintiffs absent legally responsive answers and discovery from these defendants, as discussed at paragraphs 90-114. Other frauds were perpetrated by defendants who were permitted to enter this pervasively controlled environment without their own direct knowledge that they were entering, as part of police powers defendants' color of law conspiracy to attempt to inculpate these plaintiffs and those defendants simultaneously for purposes of entrapping both parties, and, as result, the frauds are the responsibility of both these defendants' own acts, the related fraudulent concealments, and the neglect to protect from known bad actors in the bad faith practices of police powers defendants.

Elements of Fraud	Associated-In-Fact Pattern of Racketeering Acts Used By Defendants To Construct And Conduct Fraud
Defendant(s) fraudulent act(s)	Defendants named at paragraph 799
(1) material representation - what;	Misused, abused, modified, and interfered with plaintiff uses of personal and cellular telephone computers through technical hacks during transactions to obstruct those transactions and the delivery of correct and accurate products and services; hacked and modified passwords to misuse computers; illegally install fraudulent software, applications, and spyware; illegally access, modify, and delete data, evidence, and documents; to deny plaintiff access to true and authentic websites, employment opportunities, products, services, and honest services; spoofed and fraudulently provided access to fraudulent websites which provided fraudulent services or no services; used computers to engage in fraudulent electronic banking and financial services and in false and fraudulent acts related to goods, services, and honest services, all as described in the aforementioned paragraphs 600-710, excepting paragraphs 620 and 621
(2) the representation was false - how;	Defendants repetitively deprived plaintiffs of constitutionally guaranteed rights to free and fair access to employment

	opportunities, products, services, and/or honest services in interstate commerce under federal law and in-state commerce under state law
(3) the representation was known to be false or was recklessly made – why known;	Personal and cellular telephone computers and their installed and/or accessed software applications were technically obstructed, hacked, diverted, and/or delayed from delivery by interception and/or modification in violation of federal law depriving plaintiffs of constitutionally guaranteed secure and honest services when accessing and using computers
(4) the representation was intended to induce the plaintiff to act - toward what act;	Plaintiffs were given to believe that computers would be legally secured from deliberate and targeted hacking and interference by malign government police powers actors operating without legal authority, so they took no other actions to protect their rights to free and fair access to other methods of securing computers and their applications software
(5) the plaintiff relied on the misrepresentation - form of reliance;	Plaintiffs acted in good faith in the sincere belief that services and legally entitled constitutional protections of rights would be rendered the same as for all other persons
(6) the plaintiff was damaged as a result - how	Plaintiffs were deprived of rights to secure use of computers and application software, to continuity of their own accurate and accessible data, documents, and evidence of claims, and to free market employment, products, services, and/or honest services from persons and entities they would otherwise be able to access, and damaged by the loss of opportunity, income, added costs, and deprivations of timely access to desired products and services resulting from defendant illegal obstruction of their legal rights in all forms and amounts of damages to be proven at trial

[Intentionally left blank.]

828. CLAIMS FOR RELIEF - COUNT 28

Violations of Constitutional Rights Under the First, Fourth, Fifth, Thirteenth, Fourteenth Amendments

Attempts and Conspiracy - Frauds By Mail, Wire, Computer

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. §§ 1349, 1961-1968)
Washington:	RCW § 9A.28.020, 9A.28.040, 9A.60.040
New Jersey:	NJ Stat §§ 2C:20-4, 2C:20-8, 2C:41-1 through 2C:41-6, 10:6-2
New York:	NA
California:	Cal Civil Code §§ 1708-1725
Massachusetts:	Mass Gen L ch 151b § 4, ch 265 § 51, ch 274 § 7
Arizona:	AZ Rev Stat § 13-2310 through 2312
Texas:	TX Penal Code §§ 15.02, 32.01 through 32.03, 32.42, 71.02
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs, specifically including paragraph 824 wherein both the satisfaction of the statutory test, and the further benefits to these defendant of their patterns of frauds, racketeering activity affecting interstate commerce, is described. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph. as well as state statutes in all originating locations, many of which are unknown at the time of this Complaint and will be available upon discovery.

B. Defendants have and do plan, conspire, perpetrate and engage in attempts and conspiracy to defraud by mail, wire, and/or computer.

C. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further

violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	Facts - Subcount Series	Subcount(s)
600-603	NSEC National Security Pretexting and Entanglements	1-4
604-620	HEXP Illegal Human Experimentation	1-17
622-637	RGTS Individual Rights Violations and Conspiracies	2-17
639-693	RICO Racketeering	1-55
694-710	LTHL Lethality Attempts	1-17

D. These frauds are pleaded with particularity in compliance with F. R. Civ. P. Rule 9(b) using the layer cake method described at paragraphs 593-599 since it is not possible for these plaintiffs to accurately determine the specific underlying identities of many of the defendant parties who were directly involved in the acts, violations, and injuries, due to defendant UNITED STATES' pervasive control of plaintiffs' places and manner of residence, employment, enterprise, income and benefits, and relationships. Many of these acts, violations, and injuries were perpetrated in person and using electronic and other communications by undercover police powers personnel and entities concealing their personnel and operations, and by their agents and

others they permitted special access including, without limitation press, media, entertainment, and privileged persons, wherein the actual identities of these defendants cannot reasonably be expected to be known by these plaintiffs absent legally responsive answers and discovery from these defendants, as discussed at paragraphs 90-114. Other frauds were perpetrated by defendants who were permitted to enter this pervasively controlled environment without their own direct knowledge that they were entering, as part of police powers defendants' color of law conspiracy to attempt to inculpate these plaintiffs and those defendants simultaneously for purposes of entrapping both parties, and, as result, the frauds are the responsibility of both these defendants' own acts, the related fraudulent concealments, and the neglect to protect from known bad actors in the bad faith practices of police powers defendants.

Elements of Fraud	Associated-In-Fact Pattern of Racketeering Acts Used By Defendants To Construct And Conduct Fraud
Defendant(s) fraudulent act(s)	Defendants named at paragraph 799 engaged in a sustained pattern of attempts and conspiracy across various police powers operations and by allowing illegal and fraudulent access through their technical electronic screen to specific malign actors to whom they elected to permit entry
(1) material representation - what;	(a) Obstructed delivery of mail, and sent false and fraudulent mail to induce acts and services provided in good faith by plaintiffs, as described in the aforementioned paragraphs 600, 622, 623, 624, 627, 631, 637, 639, 640, 641, 645, 649, 650, 653 (b) Obstructed delivery of correct and accurate electronic mail and provided false and deceptive emails, sent false and fraudulent emails to induce acts and services provided in good faith by plaintiffs, and engaged in electronic banking and financial services in false and fraudulent promises and acts related to goods, services, and honest services as described in the aforementioned paragraphs 600-603, 607, 608, 610-616, 618-620, 622-625, 627, 629, 631-637, 639-693, 700-702, 704, 706, 710 (c) Misused, abused, modified, and interfered with plaintiff uses of computer access devices through technical hacks during transactions to obstruct those transactions and the delivery of correct and accurate products and services, and engaged in electronic banking and financial services in false and fraudulent acts related to goods, services, and honest services as described in the aforementioned paragraphs 600-603, 608-616, 622, 635,

	636, 639-693, 704, when using payment cards, and/or during plaintiff use of UPC-A barcodes in retail stores for the purpose of fraudulently inducing shoplifting entrapment (d) Misused, abused, modified, and interfered with plaintiff uses of personal and cellular telephone computers through technical hacks during transactions to obstruct those transactions and the delivery of correct and accurate products and services; hacked and modified passwords to misuse computers; illegally install fraudulent software, applications, and spyware; illegally access, modify, and delete data, evidence, and documents; to deny plaintiff access to true and authentic websites, employment opportunities, products, services, and honest services; spoofed and fraudulently provided access to fraudulent websites which provided fraudulent services or no services; used computers to engage in fraudulent electronic banking and financial services and in false and fraudulent acts related to goods, services, and honest services, all as described in the aforementioned paragraphs 600-710, excepting paragraphs 620 and 621
(2) the representation was false - how;	Defendants repetitively deprived plaintiffs of constitutionally guaranteed rights to free and fair access to employment opportunities, products, services, and/or honest services in interstate commerce under federal law and in-state commerce under state law
(3) the representation was known to be false or was recklessly made – why known;	(a) Mail was physically obstructed, diverted, modified, or delayed from delivery by its interception in violation of federal law depriving plaintiffs of constitutionally guaranteed honest services from government and/or private mail carriers (b) Wireline communications and/or transactions were physically obstructed, diverted, and/or delayed from delivery by interception and/or modification in violation of federal law depriving plaintiffs of constitutionally guaranteed secure and honest services when using wireline services (c) Wireline communications and/or transactions were physically obstructed, diverted, and/or delayed from delivery by interception and/or modification in violation of federal law depriving plaintiffs of constitutionally guaranteed secure and honest services when using wireline services (d) Personal and cellular telephone computers and their installed and/or accessed software applications were technically obstructed, hacked, diverted, and/or delayed from delivery by interception and/or modification in violation of federal law depriving plaintiffs of constitutionally guaranteed secure and honest services when accessing and using computers
(4) the representation was intended to induce the plaintiff to act - toward what act;	(a) Plaintiffs were given to believe that services would be rendered securely and honestly so they took no other actions to protect their rights to free and fair access to other methods of

	securing these employment opportunities, products, services, and/or honest professional services (b) Plaintiffs were given to believe that computers would be legally secured from deliberate and targeted hacking and interference by malign government police powers actors operating without legal authority, so they took no other actions to protect their rights to free and fair access to other methods of securing computers and their applications software
(5) the plaintiff relied on the misrepresentation - form of reliance;	Plaintiffs acted in good faith in the sincere belief that services would be rendered the same as for all other persons Plaintiffs acted in good faith in the sincere belief that services and legally entitled constitutional protections of rights would be rendered the same as for all other persons
(6) the plaintiff was damaged as a result - how	(a) The plaintiffs were deprived of rights to free market employment or honest services from persons and entities they would otherwise be able to access, and damaged by the loss of opportunity, income, added costs, and deprivations of timely access to desired products and services resulting from defendant illegal obstruction of their legal rights in all forms and amounts of damages to be proven at trial (b) The plaintiffs were deprived of rights to free market employment, products, services, and/or honest services from persons and entities they would otherwise be able to access, and damaged by the loss of opportunity, income, added costs, and deprivations of timely access to desired products and services resulting from defendant illegal obstruction of their legal rights in all forms and amounts of damages to be proven at trial (c) The plaintiffs were deprived of rights to free market employment, products, services, and/or honest services from persons and entities they would otherwise be able to access, and damaged by the loss of opportunity, income, added costs, and deprivations of timely access to desired products and services resulting from defendant illegal obstruction of their legal rights in all forms and amounts of damages to be proven at trial (d) The plaintiffs were deprived of rights to secure use of computers and application software, to continuity of their own accurate and accessible data, documents, and evidence of claims, and to free market employment, products, services, and/or honest services from persons and entities they would otherwise be able to access, and damaged by the loss of opportunity, income, added costs, and deprivations of timely access to desired products and services resulting from defendant illegal obstruction of their legal rights in all forms and amounts of damages to be proven at trial

829. CLAIMS FOR RELIEF - COUNT 29

Violations of Constitutional Rights Under the First, Fourth, Fifth, Thirteenth, Fourteenth Amendments

Scheme to Defraud of Honest Services - Mail, Wire, Email

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. §§ 1346, 1961-1968
Washington:	RCW §§ 9A.28.020, 9A.28.040, 9A.60.040
New Jersey:	NJ Stat §§ 2C:20-8, 2C:41-1 through 2C:41-6, 10:6-2
New York:	New York Penal L. §§ 105.15, 165.15, 460.00 through 460.80
California:	Cal Civil Code §§ 1708-1725
Massachusetts:	Mass Gen L ch 151b § 4, ch 265 § 51, ch 274 § 7
Arizona:	AZ Rev Stat § 13-2310 through 2312
Texas:	TX Penal Code § 32.01 through 32.03, 32.42
Maryland:	WA NJ NY CA MA MD TX AZ

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs, specifically including paragraph 824 wherein both the satisfaction of the statutory test, and the further benefits to these defendant of their patterns of frauds, racketeering activity affecting interstate commerce, is described. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph. as well as state statutes in all originating locations, many of which are unknown at the time of this Complaint and will be available upon discovery.

B. Defendants have and do plan, conspire, perpetrate and engage in their series of schemes, conspiracies, and deprivations of honest services to the Lead Plaintiff and closely held business entities as specifically cited and described in the final subparagraph below, both within and without the territory of these states and of the United States. Defendants have and do actively create these acts, violations, and injuries which have and do deprive the Lead Plaintiff of honest services and of access to honest services in, among other places, Washington, California, Arizona, New York, New Jersey, Illinois, Iowa, Texas, Maryland, Massachusetts,.

C. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	**Facts - Subcount Series**	**Subcount(s)**
600-602	NSEC National Security Pretexting and Entanglements	1-3
608, 610-613, 615, 620	HEXP Illegal Human Experimentation	5, 7-10, 12, 17
622-627, 631-637	RGTS Individual Rights Violations and Conspiracies	2-7, 11-17
639-693	RICO Racketeering	1-55
704, 706, 710	LTHL Lethality Attempts	11, 13, 17

D. These frauds are pleaded with particularity in compliance with F. R. Civ. P. Rule 9(b) using the layer cake method described at paragraphs 593-599 since it is not possible for these

plaintiffs to accurately determine the specific underlying identities of many of the defendant parties who were directly involved in the acts, violations, and injuries, due to defendant UNITED STATES' pervasive control of plaintiffs' places and manner of residence, employment, enterprise, income and benefits, and relationships. Many of these acts, violations, and injuries were perpetrated in person and using electronic and other communications by undercover police powers personnel and entities concealing their personnel and operations, and by their agents and others they permitted special access including, without limitation press, media, entertainment, and privileged persons, wherein the actual identities of these defendants cannot reasonably be expected to be known by these plaintiffs absent legally responsive answers and discovery from these defendants, as discussed at paragraphs 90-114. Other frauds were perpetrated by defendants who were permitted to enter this pervasively controlled environment without their own direct knowledge that they were entering, as part of police powers defendants' color of law conspiracy to attempt to inculpate these plaintiffs and those defendants simultaneously for purposes of entrapping both parties, and, as result, the frauds are the responsibility of both these defendants' own acts, the related fraudulent concealments, and the neglect to protect from known bad actors in the bad faith practices of police powers defendants.

E. In *Percoco v. United States,* 598 U.S. ___ (2023), the Supreme Court defined the boundaries of honest services fraud related to public employees, and to agents acting on behalf of and in coordination or conspiracy with governments, all of whom have a duty to provide honest services. Fiduciaries also have legal obligations to provide honest services including, without limitation, financial institutions, attorneys, accountants, tax software providers, and others in trust relationships with regard to the services they render, whether rendered honestly in constructive fraud or dishonestly in common law frauds. These defendants knowing provided dishonest services individually, jointly, and in conspiracy to (a) support and sustain acts,

violations, and injuries of constitutional rights; (b) to sustain involuntary servitude in service of the illegal human subject biomedical and coercive psychological experiments; (c) to sustain development, testing, and deployment of the illegal BRMT bioweapon and bioweapon delivery system; (d) to sustain the associated-in-fact enterprise pattern of racketeering acts; (e) to sustain fraudulent concealment of the entire associated-in-fact enterprise and systematic violations of constitutional rights.

Elements of Fraud	Associated-In-Fact Pattern of Racketeering Acts Used By Defendants To Construct And Conduct Fraud
Defendant(s) fraudulent act(s)	Defendants named at paragraph 799
(1) material representation - what;	Obstructed delivery of mail, and sent false and fraudulent mail to induce acts and services provided in good faith by plaintiffs, as described in the aforementioned paragraphs 600-602, 608, 610-613, 615, 620, 622-627, 631-637, 639-693, 704, 706, 710
(2) the representation was false - how;	Defendants repetitively deprived plaintiffs of constitutionally guaranteed rights to free and fair access to honest services in interstate commerce under federal law and in-state commerce under state law
(3) the representation was known to be false or was recklessly made – why known;	Depriving plaintiffs of constitutionally guaranteed honest services from these defendants in their roles as employees of enterprises controlled by these plaintiffs, wherein the plaintiffs derived direct income and benefits or intended to do so in the future by their own efforts and those of others presenting as employees or future employees; by fiduciaries, by government officials and employees, and/or by agents of government
(4) the representation was intended to induce the plaintiff to act - toward what act;	Plaintiffs were given to believe that honest services would be rendered securely and honestly so they took no other actions to protect their rights to free and fair access to other methods of securing these honest professional services
(5) the plaintiff relied on the misrepresentation - form of reliance;	Plaintiffs acted in good faith in the sincere belief that honest services would be rendered the same as for all other persons
(6) the plaintiff was damaged as a result - how	Plaintiffs were deprived of rights to free market honest services from persons and entities they would otherwise be able to access, and damaged by the loss of opportunity, income, added costs, and deprivations of timely access to desired honest services outcomes to themselves and to the enterprises they owned, managed, and derived income and benefits from, as the direct result defendant illegal obstruction of their legal rights to honest services, and were injured as a result in all forms and amounts of damages to be proven at trial

830. CLAIMS FOR RELIEF - COUNT 30

Violations of Constitutional Rights Under the First, Third, Fourth, Fifth, Eighth, Thirteenth, Fourteenth Amendments

Property Rights Of Citizens - Illegal Takings And Fraudulent Forced Forfeitures

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. §§ 1584, 1961-1968; 42 U.S.C. § 1982)
Washington:	RCW 49.060.030(1)c, f
New Jersey:	NJ Stat 2C:20-4, 2C:41-1 through 2C:41-6, 10:6-2
New York:	New York Penal L. 190.05, 190.25, 190.60, 190.75, 460.00 through 460.80
California:	Cal Penal Code §§ 236, 236.1(a) Cal Labor Code §§ 2801, 2802 Cal Civil Code §§ 1708-1725
Massachusetts:	NA
Arizona:	AZ Rev Stat § 13-2310 through 2312
Texas:	TX Penal Code §§ 32.01 through 32.03, 32.42
Maryland:	WA NJ NY CA MA MD TX AZ

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph. as well as state statutes in all originating locations, many of which are unknown at the time of this Complaint and will be available upon discovery,

B. Defendants have and do plan, conspire, perpetrate and engage to deprive and remove property by illegal surreptitious means including, without limitation, through direct control and frauds, repeated and systematic destruction of career and employment opportunities, marriages, and businesses, and human trafficking to destroy the evidence thereof, while acting against the interests and property of Lead Plaintiff and similarly situated members of this class of plaintiffs in all the myriad forms of property which US persons are entitled to possess, own, and enjoy, in associated-in-fact enterprise patterns of racketeering acts. These acts, violations and injuries have been and are for the corrupt and criminal purposes of perpetuating and sustaining involuntary

servitude and continuing illegal abuses of these US persons with the illegal BRMT bioweapon and bioweapon delivery system, among other acts, injuries, and violations at the final subparagraph in this paragraph, both within and without the territory of the United States.

C. In furtherance of this conspiracy, defendants have and do act in violation of federal statutes and the state laws of at least 44 states physically visited by Lead Plaintiff, and in violation of international laws and treaties, all as perpetrated by defendant UNITED STATES and its defendant co-conspirators:

(i) pretexting and acts, violations, and injuries directed at Lead Plaintiff and other members of this class of plaintiffs; by defendant UNITED STATES' election in its illegal discretionary acts in (ii) permitting, enlisting, empowering, and/or enabling domestic and foreign fraudulent actors electronically screened in by defendants, (iii) permitting, enlisting, empowering, and/or enabling foreign intelligence services of countries pretexted and/or physically visited by Lead Plaintiff, and/or (iv) pretexted regarding Lead Plaintiff to cause other discriminatory illegal acts targeting Lead Plaintiff, and/or other members of this class of plaintiffs, in violation of US law and of their own laws, and of any reasonable standard of practice, in

(a) their series of schemes, conspiracies, injuries, and deprivations of rights, and of (b) deprivations of Privileges and Immunities, including, without limitation, (b-i) Lead Plaintiff's rights to free, equal, and non-discriminatory access to acquire, possess, retain, and enjoy all forms of property, including those rights to same as guaranteed under ratified international treaties, and (b-ii) including such rights as they relate to employment, interstate commerce, and to closely held business entities. Defendants have and do injure the Lead Plaintiff and other members of the class by such deprivations of

rights. Locations and particular details of many of these acts, violations, and injuries are unknown at the time of this Complaint subject to discovery.

D. Defendant UNITED STATES, acting with its co-conspirators, has and does orchestrate alternative forms of thefts and deprivations of personal, financial, real, and intangible property as an alternative form of property seizure without due process. Defendants use apparent life events, carefully contrived, including, without limitation, divorce, personal guarantees tied to orchestrated business failures, deprivations of benefits, personal bankruptcies, thefts of services, programmed employment and unemployment, dishonest professional services, to deprive these plaintiffs of their constitutional property rights. This complaint is an encyclopedic and repetitive recitation of the methods of these defendants' property seizures by alternate means, which use direct frauds, delays, and deprivations of legally available benefits to these plaintiffs to fraudulently consume their limited financial resources by illegally concealed means of color of law abuses which result in losses and takings of personal, financial, real, and intangible property, to wit:

Primary Methods Of Alternate Form Property Rights Deprivations And Seizures	**Short Title - Paragraph Reference**
Orchestrations of relationships by programmed isolation during constrained employment and by illegal constraints on electronic access	WSU, Susan Irish – 4(vii), 492, 600G, 608, 632 Lynne – 4(viii), 104, 311, 494-498, 600H, 608, 609, 621, Interline Exhibit 13 Jeanette – 104, 216-218, 302, 440-448, 453, 481, 498-502, 567, 600I, 610, 624G, 627B-E, 632, 649B, 650B(ii), Interline Exhibit 14 Fraudulent orchestrated dates Seattle, Portland – 632, 634A Marinka Modderman – 608, 611, 632, 634 Laura – 608, 612 Fraudulent orchestrated dates, NYC – 632, 634 Gia – 608, 613, 632
Programmed marital strife and divorce	Lynne – 4(viii), 104, 311, 494-498, 600H, 608, 609, 621, Interline Exhibit 13

	Jeanette – – 104, 216-218, 302, 440-448, 453, 481, 498-502, 567, 600K, 610, 624G, 627B-E, 632, 649B, 650B(ii), Interline Exhibit 14
Programmed employment and unemployment	Deloitte Seattle – 211, 424-438, 494, 541 table, 599D(i)b, 600H-J, 609A, 610A, 623B, 626A(viii), (x), 639, 640 LazerSoft – 120, 215, 427, 428, 437-442, 471A(iv), 499, 600, 639, 640 Alliance – 445-449, 453, 471(ii) through (v), 601A through H, 610, 622, 626, 644, 645A, 649, 650B(i), 651-653, 681A, 683 PAN – 450-451, 519, 599D(i)c, 600, 601, 623, 627B, 639, 640, 644B(iv), 649E, 650B(ii), 652, 653, 683B(iv) Pacific Pipeline – 427, 454-456, 465, 600, 602, 621D, 626A(vii), 639, 640 CNA – 427, 457-460, 471, 516, 600, 602, 604B, 615D, 617F, 626A(ii), (viii), (x), 639, 640, 641, 642A, 644B(v), 673A, 683A Allegent dba Performa – 99e, 219, 275(i), 276, 320f(vi), 461-462, 471, 516, 562, 604B, 606C, 626A(ix), 644(v), (vi), 650B(iii), (iv), 673A, 683A Establish – 11, 99e, g, 165, 166, 213, 320c, 320f(v), 416, 427, 462-471(i), 471(v), 472, 474, 482, 503, 518-519, 521, 536, 557, 599D(i)(e), 600, 602, 603, 611, 634A, C, 639, 640, 641, 650D, 656D) Banner Bank (shadow bank) – employer of Bruce Brewer (Lead Plaintiff's uncle) while in Bothell, WA, and referenced by COOK as his funding source for CNA, dependent on discovery
Penury in employment and unemployment	Extended uncompensated employment and unemployment before Pacific Pipeline – 454 Extended unemployment after Pacific Pipeline - 457 Compensation reduction on entry CNA - 457 CNA contrived financial distress forces compensation reduction – 644B(v)

	CNA "founder" Cook removes $100,000 from CNA as PSNS project looms - 461 Starve out to homelessness for trafficking to Boston - 463 Homelessness and unemployment in Boston – 463-465 Post Establish Cliffside Park unemployment to homeless detention – 643 Perpetuated unemployment 2008 to present - 639, 640
Thefts of market rate compensation and bonuses by frauds and misrepresentations, including of captive employees within cover companies operated by defendants for illegal searches, for domestic economic espionage, and for international espionage activities	Deloitte Seattle, LazerSoft, Alliance PAN – 450-451, 623 Pacific Pipeline CNA – 457-460, 644 Allegent, LLC dba Performa Establish – 462-474, 641
Thefts of labor, materials, and services from vulnerable individuals	Chalom at Cliffside Park apartment – 642
Deprivations of government benefits, such as SBA and unemployment benefits	Alliance SBA bonding - 649 Chalom through unemployment compensation deprivation - 643
Dishonest professional services - financial instruments	Mortgage $9950 pre-payment penalty at 149th St Kirkland – 610I Shadow banking fees and credit insurance – 645, 646
Dishonest professional services - tax	TurboTax NJ earned income hack - 647
Forced legal services imposed by creation of legal controversies by government agents and/or informants on targeted persons and enterprises	Alliance, Steve's Maintenance check theft – 644 Laseraccess (successor to LazerSoft) compensation litigation - 644 PAN graphic art services – 644 CNA compensation theft - 644 Allegent, ShipNow bad check litigation – 644 Winnett, Smith litigation – 644
Personal guarantees used in orchestrated business failures used to impose personal asset forfeitures to third parties or cover companies	Alliance to US Bank Kent Alliance to Pacific Financial Services – 644B(ii) Winnett to Smith –644B(viii), 659
Personal bankruptcy imposed by programmed business failures using racketeering enterprise frauds	Alliance programmed business failure to conceal evidence of prior illegal searches – 627

Entrapments – tax, financial, structured payments, medical/drugs	Alliance – 622, 651 ED, opioids offer from induced back pain – 614, 617 Laura structured payments orchestration – 622 Ironwood property release - 624
Fraudulent sales leads and sales solicitation services not rendered or intercepted by government agents during emailing to prevent authentic interactions with legitimate sales prospects	Sheldon-Lee - 679 Performa – 673, 679 Winnett/Sheldon Beef/GPR – 674-680
Fraudulent financings and fees – services not professionally provided, to and including media and entertainment industry personnel embedded with undercover government agents engaging in racketeering enterprise frauds	LazerSoft - 441 Alliance – 652, 653 PAN – 652, 653 Winnett/Sheldon/GPR – 648, 654, 655, 657-672
Compromises of assets - check frauds, receivables frauds	Alliance, Bates Voc-Tech - 650 CNA, HomeGrocer - 650 Performa, ShipNow – 650 Winnett/Sheldon Beef/GPR - 656
Transaction frauds – mergers and acquisitions of cover companies prevented and perverted	Alliance, Steve's Maintenance – 446, 626, 644, 683 Pacific Pipeline - 456
Dishonest professional services - legal counsel who do no legal work embedded in law firms as spies, contractual provisions arbitrarily modified to benefit another party rather than the represented party	Hibbs – 626, 644, 683 Thorbrogger – 626, 644, 683 Caldwell – 626, 644, 683 PAN graphic artist litigation – 683 Winnett/Sheldon Beef/GPR - 684
Dishonest professional services - accounting walk-away during professional project	Alliance, Phil Walter's sister, accounting firm - 681
Dishonest professional services - deliberate overstaffing before ownership transitions, undercover embeds operating as illegal spies and employee saboteurs	Larry's Market, employee (Brad) and partner (produce manager) – 99k LazerSoft - 686 Alliance - 686 Allegent, Pray as partner - 686 CNA - 686 Establish - 686 Winnett/Sheldon Beef/GPR – 687-690
Dishonest professional services - consultants, sales representations	Winnett/Sheldon Beef/GPR – 680, 685
Dishonest professional services – software development incomplete and inoperative	LazerSoft (WATERS) – 600K CNA at CUC (PRAY) – 458

	Winnett/Sheldon Beef/GPR - 682
Dishonest professional services – real property forced forfeitures soon after extensive improvements	133rd St, Redmond - 609 149th St, Kirkland - 610 Farm And Ranch – 625, 691-693
Predatory dismissals of founders and inventors	Friday Harbor light diffraction device (defendant is morphologically comparable to CHALOM, dependent on discovery) Drip irrigation system inventor, as represented to Lead Plaintiff by CORNWELL, dependent on discovery CNA Manufacturing- as represented to Lead Plaintiff by COOK and HOLDEN, dependent on discovery
Federal projects contract delay and acceleration orchestration to maximize cash flow difficulties and minimize profitability	Alliance, Sea-Tac project delay acceleration – 649

E. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are

the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	Facts - Subcount Series	Subcount(s)
600-603	NSEC National Security Pretexting and Entanglements	1-4
604-617	HEXP Illegal Human Experimentation	5-14
622-627, 631-634	RGTS Individual Rights Violations and Conspiracies	2-7, 11-14
639-693	RICO Racketeering	1-55
702, 706	LTHL Lethality Attempts	9, 13

F. These frauds are pleaded with particularity in compliance with F. R. Civ. P. Rule 9(b) using the layer cake method described at paragraphs 593-599 since it is not possible for these plaintiffs to accurately determine the specific underlying identities of many of the defendant parties who were directly involved in the acts, violations, and injuries, due to defendant UNITED STATES' pervasive control of plaintiffs' places and manner of residence, employment, enterprise, income and benefits, and relationships. Many of these acts, violations, and injuries were perpetrated in person and using electronic and other communications by undercover police powers personnel and entities concealing their personnel and operations, and by their agents and others they permitted special access including, without limitation press, media, entertainment, and privileged persons, wherein the actual identities of these defendants cannot reasonably be expected to be known by these plaintiffs absent legally responsive answers and discovery from these defendants, as discussed at paragraphs 90-114. Other frauds were perpetrated by defendants who were permitted to enter this pervasively controlled environment without their own direct knowledge that they were entering, as part of police powers defendants' color of law conspiracy to attempt to inculpate these plaintiffs and those defendants simultaneously for purposes of entrapping both parties, and, as result, the frauds are the responsibility of both these defendants' own acts, the related fraudulent concealments, and the neglect to protect from known bad actors in the bad faith practices of police powers defendants.

G. Defendants deprived these plaintiffs of their property rights of these plaintiffs, acting individually, jointly, and in conspiracy to (a) support and sustain acts, violations, and injuries of constitutional rights; (b) sustain involuntary servitude in service of the illegal human subject biomedical and coercive psychological experiments; (c) sustain development, testing, and deployment of the illegal BRMT bioweapon and bioweapon delivery system; (d) sustain the associated-in-fact enterprise pattern of racketeering acts; (e) sustain fraudulent concealment of the entire associated-in-fact enterprise and systematic violations of constitutional rights.

Elements of Fraud	Associated-In-Fact Pattern of Racketeering Acts Used By Defendants To Construct And Conduct Fraud
Defendant(s) fraudulent act(s)	Defendants named at paragraph 799
(1) material representation - what;	Conspired and orchestrated interstate travel in support of it associated-in fact enterprise pattern of racketeering acts intended to induce acts and services provided in good faith by plaintiffs, as described in the aforementioned paragraphs 600-603, 604-617, 622-627, 631-634, 639-693, 702, 706 and at the table 830D in this paragraph and at 830E in this paragraph
(2) the representation was false - how;	Defendants repetitively deprived plaintiffs of constitutionally guaranteed property rights to real, personal, tangible, and/or intangible property
(3) the representation was known to be false or was recklessly made – why known;	Depriving plaintiffs of constitutionally guaranteed property rights through fraudulent concealment of illegal acts, violations, and injuries targeted and intended to separate these plaintiffs' property from these plaintiffs
(4) the representation was intended to induce the plaintiff to act - toward what act;	Plaintiffs were given to believe that honest services of police powers and of agents of those police powers, and that members of the public would not knowingly thereby misrepresent themselves and their own pecuniary interests, such that services, interactions, and transactions would be rendered in ordinary, secure and honest ways generally accepted, so they took no other actions to protect their rights of free and fair access to other methods of securing themselves, their families, their constitutional rights, and their property
(5) the plaintiff relied on the misrepresentation - form of reliance;	Plaintiffs acted in good faith in the sincere belief that honest services, interactions, and transactions would be rendered the same as for all other persons
(6) the plaintiff was damaged as a result - how	Plaintiffs were deprived of property rights including, without limitation, through deprivations of free market honest services, interactions, and transactions from persons and entities they would otherwise be able to access, and were damaged by the

	loss of opportunity, income, added costs, and deprivations of timely access to their property, and through deprivations and depredations of the enterprises they owned, managed, and derived income and benefits from, all as the direct result defendant illegal direct and indirect targeted discriminations and obstructions of their legal rights to property, and were injured as a result in all forms and amounts of damages to be proven at trial

831. CLAIMS FOR RELIEF - COUNT 31

Violations of Constitutional Rights Under the First, Fourth, Fifth, Thirteenth, Fourteenth Amendments

Racketeering - Monetary Benefit From Unlawful Activity

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. §§ 1961-1968; 42 U.S.C. § 1982
Washington:	RCW § 9A.82.010(12)
New Jersey:	NJ Stat §§ 2C:41-1 through 2C:41-6, 10:6-2
New York:	NA
California:	Cal Penal Code §§ 236, 236.1(a) Cal Labor Code §§ 2801, 2802 Cal Civil Code §§ 1708-1725
Massachusetts:	NA
Arizona:	AZ Rev Stat § 13-2308, 13-2310 through 2312
Texas:	NA
Maryland:	MD Criminal Law Code § 9-801 through 9-805

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph. as well as state statutes in all originating locations, many of which are unknown at the time of this Complaint and will be available upon discovery,

B. Defendants have and do plan, conspire, perpetrate and engage in their series of schemes, conspiracies, and deprivations of real, financial, and personal property to the Lead Plaintiff and closely held business entities, among other acts, injuries, and violations at the final subparagraph in this paragraph, both within and without the territory of the United States.

Discovery will provide evidence of this widespread pattern of practice by illegally embedded police powers personnel posing as executive employees. While there is no civil remedy which directly attaches to 18 U.S.C. § 654, the conversion of property by a government employee is also a specific criminal offense, in addition to its status as an associated-in-fact enterprise racketeering offense and as a rights violation, when brought as it is in this paragraph for constitutional property rights violations and injuries.

C. These associated-in-fact enterprise racketeering acts, which have and do provide direct monetary benefit from unlawful activity have and do include, without limitation, defendant ROSENBERG (FBI), while illegally embedded at NutraSource, who exploited his relationship with Lead Plaintiff and with other captive Board members of NutraSource (WEISSMAN, FBI as PCC General Manager Whiteman, two FBI illegal embeds at Oakland Food Cooperative, Oakland, CA, and Carr's/Gottstein's Gallant – Anchorage, AK) for the purpose of securing and continuing a Sahale Golf and Country Club, Redmond, WA, initiation fees, membership, fees, and dues, all paid directly and indirectly with equity finds contributed by and through orchestrated sales to Puget Consumer Cooperative, NutraSource's 50% founding investor ($200,000) which was then illegally managed by WEISSMAN (FBI), whose Board of Trustees included Lead Plaintiff, for the purpose of securing a personal benefit and compensation, not otherwise available to federal employees by use of federal funds, during his illegally embedded tenure as CEO of NutraSource during the 1980s and 1990s, until NutraSource was sold to another natural food wholesale company in Auburn, CA, which may also have been an illegal cover company, also used as a device to destroy the business records of NutraSource for the corrupt of fraudulent concealment of evidence of illegal surveillance and surreptitious targeted property destruction through commerce, which Auburn, CA cover company itself, was later sold to UNFI, a publicly traded company.

D. Individual defendants employed by government as police powers personnel accepted Lead Plaintiff's corporate entities' company stock and company stock options (Winnett and Sheldon Beef, paragraphs 685-690 RICO-47-52) in their own or their cover names either for the purpose of directly benefitting from their fraudulent employment or with the advance knowledge that crimes in interstate commerce related to the financial destruction of these enterprises were intended by them and by their police powers employers to occur to avoid this illegal conversion through to monetary benefit in conjunction with their associated-in-fact enterprise pattern of racketeering acts, violations, and injuries.

E. Defendant UNITED STATES also has and does benefit from this illegal takeover and/or embedding of its personnel in private enterprises, whose commercial purpose is to benefit their members and/or shareholders, by misdirecting and reallocating private funds toward purposes other than purposes intended to directly benefit those members and/or owners, and which has and does use those private resources for its own benefit, by, for example using employees to illegally spy and report on others it may be targeting for its illegal purposes, by misdirecting these activities while embedded as supervisors, managers, and/or executives, as was the case with defendants WEISSMAN and ROSENBERG including, without limitation, before, during, and after Lead Plaintiff was a Board member of organizations (PCC, NutraSource, Pacific Pipeline) illegally managed by those illegally embedded defendant UNITED STATES (including, without limitation, DOJ, FBI, USMS, CIA, ARMY) agents. Misallocation of these private sector revenues and profits to governmental purposes, rather than the private purposes intended in private enterprises, operates as illegal appropriations of private moneys, a form of theft used to facilitate illegal acts by defendant UNITED STATES outside constitutional prohibitions and in direct contradiction and contravention of Congressional intent, and illegal

conversion criminally indicted by defendant DOJ against labor unions and other organizations under 18 U.S.C. 1961-1968.

F. Defendant UNITED STATES has and does derive continuing monetary benefits from its associated-in-fact enterprise pattern of racketeering acts, specifically by continuing its involuntary servitude of Lead Plaintiff in his continued subjugation for illegal human medical experiments. Defendant UNITED STATES and/or a predesignated purchaser acting with direct knowledge secured a monetary benefit from a bargain purchase in the forced rapid sale of Lead Plaintiff's first purchased and improved residence at 133rd Street in Redmond, WA, when defendant UNITED STATES (and defendant BURNS and other unknown defendants) used the illegal BRMT bioweapon and bioweapon delivery system (oxytocin – "love" hormone) against Lead Plaintiff's first spouse, Lynne, in her US West New Vector Group workplace affair with SWAIN (after the double homicide attempt at paragraph 694 failed), who then owned the cellular telephone equipment installation shop which installed the cellular telephone equipment box in Lead Plaintiff's vehicle used in the double homicide attempt at Porteau Cove (paragraph 694 LETHL-1), and was a known serial adulterer, to cause and create the divorce of Lead Plaintiff and spouse Lynne in 1988. These illegal acts by defendant UNITED STATES (defendant BURNS and unknown others) forced the rapid bargain sale in 1988 within ten days of listing of their jointly owned residence (Interline Exhibit 13), by the hand of an embedded and self-interested defendant FBI or USMS "realtor," who had originally and abruptly jacked up the purchase price by $5,000 during the initial purchase in 1984. This forced 1988 bargain sale was undertaken a few months after the Lead Plaintiff completed extensive and expensive landscaping improvements to the rear of the property (approximately 14,000 square feet including tress, plants, hedge, purchased sod and in-ground sprinklers) at considerable time and expense. (Paragraph 510, Interline Exhibit 13)

G. Defendant UNITED STATES has and does derive continuing monetary benefits from its associated-in-fact enterprise pattern of racketeering acts, specifically by continuing its involuntary servitude of Lead Plaintiff in his continued subjugation for illegal human medical experiments. Defendant UNITED STATES and/or a predesignated purchaser acting with direct knowledge and secured a monetary benefit from a bargain purchase in the forced rapid sale of Lead Plaintiff's residence at 149th Street in Kirkland, WA, in 2005,when defendant UNITED STATES caused and created the divorce of second wife Jeanette after Lead Plaintiff completed extensive improvements to the 149th Street residence. During the refinancing of the two Chase Bank HELOCs and credit card debt used as construction loans for these improvements, defendant UNITED STATES orchestrated, and Jeanette arranged, a pre-payment penalty of $9,950 on the mortgage loan (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, 661 RICO-18, 23). Later, the embedded agent realtor, who was a "friend" or federal agent handler of fraudulently orchestrated spouse Jeanette (coerced into the relationship with Lead Plaintiff as a deferred military criminal prosecution active duty ARMY bisexual soldier in civilian dress in 1988, a *Third* Amendment violation), offered a unilateral $5,000 price reduction without authorization, all part of its on-going associated-in-fact enterprise pattern of racketeering acts which deprived Lead Plaintiff and spouse Jeanette of the full appreciation of this forced real estate sale, which occurred within ten to thirty days of listing, (paragraph 511, Interline Exhibit 14).

H. Defendant UNITED STATES has and does derive continuing monetary benefits from its associated-in-fact enterprise pattern of racketeering acts, specifically by continuing its involuntary servitude of Lead Plaintiff in his continued subjugation for illegal human medical experiments when it deprived Lead Plaintiff's business Alliance Environmental Services of

Small Business Administration bid and performance bonding services from 1990 to 1993 by the false personation of an SBA employee by defendant FBI, who then also provided a fraudulent performance bond for a federally funded project using a previously seized Utah insurance company as cover for this fraudulent issuance, then cancelled that performance bond they had fraudulently issued in the seized insurance company's name during the course of the project it was intended to secure, and arranged the acceleration of the project's performance schedule to exacerbate cash flow problems, all to create financial distress for Alliance and for the Lead Plaintiff, then again deprived the company of performance bonding to deprive Alliance of a federally funded air route traffic control center project for about $1.2 million, and also engaged with defendant CIA, in a cross-border financing fraud buried in another cross-border investigation with CSIS and RCMP, and a factoring fraud, all used to force a personal bankruptcy which deprived Lead Plaintiff of nearly all financial assets and severely damaged his access to credit, while they used other mail and wire frauds to perpetuate compensation frauds and deprivation of free and fair access to other employment opportunities (paragraphs 450-451, 601F NSEC-2, 639, 652, 653 RICO-1, 14, 15).

I. Defendant UNITED STATES has and does derive continuing monetary benefits from its associated-in-fact enterprise pattern of racketeering acts, specifically by continuing its involuntary servitude of Lead Plaintiff in his continued subjugation for illegal human medical experiments. Defendant UNITED STATES derived monetary benefits from its racketeering acts by continuing its involuntary servitude of Lead Plaintiff in his continued subjugation for illegal human medical experiments on him when it repeated this scheme and accelerated his programmed financial and psychological destruction to suicide ideation and homelessness in 2002 to 2005 using a combination of check fraud and false sales opportunities requiring extensive travel throughout the United States to starve another Lead Plaintiff company, Allegent,

LLC dba Performa, of legitimate sales opportunities, and to again force the rapid bargain sale, this time to avoid foreclosure, of Lead Plaintiff's 149th Street, Kirkland, WA residence, improved using over $100,000 of out of pocket and borrowed funds (paragraphs 99e, 219, 275(i), 276, 320f(vi), 461-462, 471, 516, 562, 604B, 606C, 626A(ix), 644(v), (vi), 650B(iii), (iv), 673A, 683A) between about 1994 and 2004 (Interline Exhibit 14).

J. Defendant UNITED STATES has and does derive continuing monetary benefits from its associated-in-fact enterprise pattern of racketeering acts, specifically by continuing its involuntary servitude of Lead Plaintiff in his continued subjugation for illegal human medical experiments. Defendant UNITED STATES derived monetary benefits from its racketeering acts by continuing its involuntary servitude of Lead Plaintiff in his continued subjugation for illegal human medical experiments on him when it repeated this scheme and accelerated his programmed financial and psychological destruction to suicide ideation and homelessness again at his residence in Cliffside Park, NJ in 2010 (paragraph 474, 642 RICO-4).

K. Defendant UNITED STATES has and does derive continuing monetary benefits from its associated-in-fact enterprise pattern of racketeering acts, specifically by continuing its involuntary servitude of Lead Plaintiff in his continued subjugation for illegal human medical experiments. Defendant UNITED STATES derived monetary benefits from its racketeering acts by continuing its involuntary servitude of Lead Plaintiff in his continued subjugation for illegal human medical experiments on him when it repeated this same process, except for an explicit suicide ideation in this specific instance, at Ramsey, NJ, (paragraph 513, also LPEE email to AKOTO on 171027).

L. Defendant UNITED STATES has and does derive continuing monetary benefits from its associated-in-fact enterprise pattern of racketeering acts, specifically by continuing its involuntary servitude of Lead Plaintiff in his continued subjugation for illegal human medical

experiments. Defendant UNITED STATES derived monetary benefits from its racketeering acts by continuing its involuntary servitude of Lead Plaintiff in his continued subjugation for illegal human medical experiments on him when it repeated this same process, except for an explicit suicide ideation in this specific instance, yet again in his trafficking to Edgewater, NJ in 2018 (paragraph 648 RICO-10 and other paragraphs cited therein).

M. Defendant UNITED STATES has and does derive continuing monetary benefits from its associated-in-fact enterprise pattern of racketeering acts, specifically by continuing its involuntary servitude of Lead Plaintiff in his continued subjugation for illegal human medical experiments. Each and every time, defendant UNITED STATES, acting through its departments and agencies including, without limitation, defendants CIA, ARMY, FBI, USMS, DHA, USSS, CPB, conspired and acted to deprive him of (i) the benefit of his financial investments, (ii) adequate compensation for his labor, materials, and other expenses, and (iii) of any enjoyment of those improvements, and (iv) each time this occurred very soon after (never during) the time these investments, expenses, and labor were completed.

N. Defendant UNITED STATES has and does derive continuing monetary benefits from its associated-in-fact enterprise pattern of racketeering acts, specifically by continuing its involuntary servitude of Lead Plaintiff in his continued subjugation for illegal human medical experiments. In each of these four sequences, the two forced removals from his owned real properties, and the two removals from his rented residences, the removal occurred soon after the improvements were completed and before financial reserves could be reaccumulated. This is the very same pattern of acts these defendants also used to orchestrate periods of employment, unemployment, and setbacks in his pay rate while he had little or no bargaining power and his paths to alternative employment were blocked by mail frauds and wire frauds during his employment searches, as well documented int the subparagraphs cited above.

O. Defendant UNITED STATES has and does derive continuing monetary benefits from its associated-in-fact enterprise pattern of racketeering acts, specifically by continuing its involuntary servitude of Lead Plaintiff in his continued subjugation for illegal human medical experiments. Thereafter, defendant UNITED STATES and its co-conspirators completely eliminated all the Lead Plaintiff's employment options, including all professional employment, and even including hourly part-time employment at a local supermarket in Ramsey, NJ while he lived there between 2011 and 2018.

P. Defendant UNITED STATES has and does derive continuing monetary benefits from its associated-in-fact enterprise pattern of racketeering acts, specifically by continuing its involuntary servitude of Lead Plaintiff in his continued subjugation for illegal human medical experiments. All these acts were and are part of their conspiracy and scheme to deprive Lead Plaintiff of the benefits of real property appreciation and the accumulation of financial resources so as to sustain his involuntary servitude to defendant UNITED STATES' BRMT brain hijacking program and its attempted fraudulent concealment and cover-up in plain sight. These defendants used their official knowledge and their color of law "investigations" to individually and personally to directly benefit themselves or others by exploiting this insider conspiracy and knowledge of each of these frauds and schemes in sequence from 1968 to the present.

Q. Particular details of those directly benefiting or steering to certain persons the benefits of these property improvements and subsequent appreciation of real properties which Lead Plaintiff improved (including, without limitation, from $189,340 in 1984 to $1,829,013 in 2023 per Redfin.com for his first residence in Redmond, WA; and from zero equity on marriage to Jeanette in 1990 to $1,091,991 in 2024 per Redfin.com) are unknown at the time of this complaint and will be available to be introduced upon proper discovery.

R. Defendant UNITED STATES has and does derive continuing monetary benefits from its associated-in-fact enterprise pattern of racketeering acts, specifically by continuing its involuntary servitude of Lead Plaintiff in his continued subjugation for illegal human medical experiments. A known group of human subjects provides the virtually immeasurable economic benefit of a specific group of extremely well-known and long studied human subject victims intis illegal pursuit of the internationally prohibited BRMT bioweapon and bioweapon delivery system, illegal under 18 U.S.C. § 175. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	Facts - Subcount Series	Subcount(s)
600-603	NSEC National Security Pretexting and Entanglements	1-4
604-620	HEXP Illegal Human Experimentation	1-17
621-637	RGTS Individual Rights Violations and Conspiracies	1-17
639-693	RICO Racketeering	1-55
694-710	LTHL Lethality Attempts	1-17

S. These frauds are pleaded with particularity in compliance with F. R. Civ. P. Rule 9(b) using the layer cake method described at paragraphs 593-599 since it is not possible for these plaintiffs to accurately determine the specific underlying identities of many of the defendant parties who were directly involved in the acts, violations, and injuries, due to defendant UNITED STATES' pervasive control of plaintiffs' places and manner of residence, employment, enterprise, income and benefits, and relationships. Many of these acts, violations, and injuries were perpetrated in person and using electronic and other communications by undercover police powers personnel and entities concealing their personnel and operations, and by their agents and others they permitted special access including, without limitation press, media, entertainment, and privileged persons, wherein the actual identities of these defendants cannot reasonably be expected to be known by these plaintiffs absent legally responsive answers and discovery from these defendants, as discussed at paragraphs 90-114. Other frauds were perpetrated by defendants who were permitted to enter this pervasively controlled environment without their own direct knowledge that they were entering, as part of police powers defendants' color of law conspiracy to attempt to inculpate these plaintiffs and those defendants simultaneously for purposes of entrapping both parties, and, as result, the frauds are the responsibility of both these defendants' own acts, the related fraudulent concealments, and the neglect to protect from known bad actors in the bad faith practices of police powers defendants.

T. Defendants converted property of these plaintiffs, described at paragraphs 830D, 830E, and as described in the entirety of this paragraph 831, for their own benefit and/or for the

benefit of other related parties and/or co-conspirator defendants, while (i) operating undercover to fraudulently conceal their identities and their relationships with parties directly benefitting from these conversions through illegally forced forfeitures under color of law, and/or their relationships with other defendants who possessed operational knowledge of these illegally forced property forfeitures, to (ii) convert and to benefit monetarily from these forced forfeitures caused by the associated-in-fact enterprise pattern of racketeering act and violations of constitutional rights which (iii) defendants caused and created to individually, jointly, and in conspiracy, which illegal conversions for monetary benefit have and do (a) support and sustain acts, violations, and injuries of constitutional rights; (b) sustain involuntary servitude in service of the illegal human subject biomedical and coercive psychological experiments; (c) sustain development, testing, and deployment of the illegal BRMT bioweapon and bioweapon delivery system; (d) sustain the associated-in-fact enterprise pattern of racketeering acts; (e) sustain fraudulent concealment of the entire associated-in-fact enterprise and systematic violations of constitutional rights.

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832. CLAIMS FOR RELIEF - COUNT 32

Violations of Constitutional Rights Under the First, Fourth, Fifth, Thirteenth, Fourteenth Amendments

Interstate and Foreign Travel or Transportation For Racketeering Purposes

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. §§ 1952, 1961-1968
Washington:	RCW § 9A.82.010(12)
New Jersey:	NJ Stat §§ 2C:20-8, 2C:41-1 through 2C:41-6, 10:6-2
New York:	NA
California:	Cal Penal Code §§ 236, 236.1(a) Cal Labor Code §§ 2801, 2802 Cal Civil Code §§ 1708-1725
Massachusetts:	Mass Gen L ch 271a §§ 1-3
Arizona:	AZ Rev Stat § 13-2308, 13-2310 through 2312
Texas:	TX Penal Code §§ 32.01 through 32.03, 32.42, 71.02
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph. as well as state statutes in all originating locations, many of which are unknown at the time of this Complaint and will be available upon discovery.

B. Defendants have and do plan, conspire, perpetrate and engage in their series of frauds, schemes, conspiracies, injuries, and deprivations of rights using interstate and international travel, federally funded public transportation modes and facilities in interstate and international commerce, to deprive the Lead Plaintiff and closely held business entities, among other acts, injuries, and violations at the final subparagraph in this paragraph, both within and without the territory of the United States.

C. Defendant UNITED STATES, through its various departments and agencies and in collaboration with other co-conspirator defendants, conducted interstate and international travel and transportation for racketeering purposes in the never completed fraudulent financings of

Alliance Environmental Services Corporation (paragraph 623 RGTS-3, 653 RICO-15, Vancover, Canada), PAN (paragraphs 601 NSEC-2, 652 RICO-14, London, UK), and in the fraudulent trafficking and employment at ESTABLISH (paragraph 603 NSEC-4, 641 RICO-3, London, UK).

D. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	**Facts - Subcount Series**	**Subcount(s)**
600-603	NSEC National Security Pretexting and Entanglements	1-4
607, 608, 610-611, 613, 615, 618, 619	HEXP Illegal Human Experimentation	4-5, 7-8, 10, 12, 15, 16

623-628, 632, 634	RGTS Individual Rights Violations and Conspiracies	3-8, 12, 14
639-642, 644, 648-650, 652-655, 658, 661, 666-669, 671, 672, 673, 684-687, 689, 690, 692, 693	RICO Racketeering	1-4, 6, 10-12, 14-17, 20, 23, 28-31, 33, 34, 35, 46-49, 51, 52, 54, 55
694, 700, 702, 707-709	LTHL Lethality Attempts	1, 7, 9, 14-16

E. These frauds are pleaded with particularity in compliance with F. R. Civ. P. Rule 9(b) using the layer cake method described at paragraphs 593-599 since it is not possible for these plaintiffs to accurately determine the specific underlying identities of many of the defendant parties who were directly involved in the acts, violations, and injuries, due to defendant UNITED STATES' pervasive control of plaintiffs' places and manner of residence, employment, enterprise, income and benefits, and relationships. Many of these acts, violations, and injuries were perpetrated in person and using electronic and other communications by undercover police powers personnel and entities concealing their personnel and operations, and by their agents and others they permitted special access including, without limitation press, media, entertainment, and privileged persons, wherein the actual identities of these defendants cannot reasonably be expected to be known by these plaintiffs absent legally responsive answers and discovery from these defendants, as discussed at paragraphs 90-114. Other frauds were perpetrated by defendants who were permitted to enter this pervasively controlled environment without their own direct knowledge that they were entering, as part of police powers defendants' color of law conspiracy to attempt to inculpate these plaintiffs and those defendants simultaneously for purposes of entrapping both parties, and, as result, the frauds are the responsibility of both these

defendants' own acts, the related fraudulent concealments, and the neglect to protect from known bad actors in the bad faith practices of police powers defendants.

F. In *Percoco v. United States*, 598 U.S. ___ (2023), the Supreme Court defined the boundaries of honest services fraud related to public employees, and to agents acting on behalf of and in coordination or conspiracy with governments, all of whom have a duty to provide honest services. Fiduciaries also have legal obligations to provide honest services including, without limitation, financial institutions, attorneys, accountants, tax software providers, and others in trust relationships with regard to the services they render, whether rendered honestly in constructive fraud or dishonestly in common law frauds. These defendants knowing provided dishonest services individually, jointly, and in conspiracy to (a) support and sustain acts, violations, and injuries of constitutional rights; (b) to sustain involuntary servitude in service of the illegal human subject biomedical and coercive psychological experiments; (c) to sustain development, testing, and deployment of the illegal BRMT bioweapon and bioweapon delivery system; (d) to sustain the associated-in-fact enterprise pattern of racketeering acts; (e) to sustain fraudulent concealment of the entire associated-in-fact enterprise and systematic violations of constitutional rights.

Elements of Fraud	Associated-In-Fact Pattern of Racketeering Acts Used By Defendants To Construct And Conduct Fraud
Defendant(s) fraudulent act(s)	Defendants named at paragraph 799
(1) material representation - what;	Obstructed delivery of mail, and sent false and fraudulent mail to induce acts and services provided in good faith by plaintiffs, as described in the aforementioned paragraphs 600-602, 608, 610-613, 615, 620, 622-627, 631-637, 639-693, 704, 706, 710
(2) the representation was false - how;	Defendants repetitively deprived plaintiffs of constitutionally guaranteed rights to free and fair access to honest services in interstate commerce under federal law and in-state commerce under state law
(3) the representation was known to be false or was	Depriving plaintiffs of constitutionally guaranteed honest services from these defendants in their roles as employees of enterprises controlled by these plaintiffs, wherein the plaintiffs

recklessly made – why known;	derived direct income and benefits or intended to do so in the future by their own efforts and those of others presenting as employees or future employees; by fiduciaries, by government officials and employees, and/or by agents of government
(4) the representation was intended to induce the plaintiff to act - toward what act;	Plaintiffs were given to believe that honest services would be rendered securely and honestly so they took no other actions to protect their rights to free and fair access to other methods of securing these honest professional services
(5) the plaintiff relied on the misrepresentation - form of reliance;	Plaintiffs acted in good faith in the sincere belief that honest services would be rendered the same as for all other persons
(6) the plaintiff was damaged as a result - how	Plaintiffs were deprived of rights to free market honest services from persons and entities they would otherwise be able to access, and damaged by the loss of opportunity, income, added costs, and deprivations of timely access to desired honest services outcomes to themselves and to the enterprises they owned, managed, and derived income and benefits from, as the direct result defendant illegal obstruction of their legal rights to honest services, and were injured as a result in all forms and amounts of damages to be proven at trial

833. CLAIMS FOR RELIEF - COUNT 33

Violations of Constitutional Rights Under the First, Fifth, Eighth, Thirteenth, Fourteenth Amendments

Free Exercise Of Religion

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	42 U.S.C. §§ 1985, 2000bb-1
Washington:	RCW § 49.060.030(1)
New Jersey:	NA
New York:	NA
California:	NA
Massachusetts:	NA
Arizona:	NA
Texas:	NA
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state

statutes listed above in this paragraph. as well as state statutes in all originating locations, many of which are unknown at the time of this Complaint and will be available upon discovery.

B. Congress adopted the Religious Freedom Restoration Act in 1993 to restore the prior historical pattern of religious freedom in religious expression which had prevailed from the founding until it was disrupted by the Supreme Court in 1990. Except for this brief period from April 17, 1990 to November 16, 1993, the prevailing law in the United States conformed to the legal principles expressed in the Religious Freedom Restoration Act.

C. Defendants have and do plan, conspire, perpetrate and engage in systematic plans, conspiracies, and violations of religious freedom to discriminate against these plaintiffs and their children from minor age to death, selected by defendant UNITED STATES (including, without limitation, CIA, ARMY, DOD, DOJ, FBI, USMS) for involuntary servitude and for illegal human medical experimentation without consent, to develop an illegal and internationally prohibited bioweapon and bioweapon delivery system, which has and does continue regardless whether or not these plaintiffs have or do sustain the specific religious practices of their forebears, based solely upon defendant UNITED STATES' initial involuntary selection of those plaintiffs and of other members of their family of origin, which authority it does not constitutionally possess. This associated-in-fact enterprise conspiracy of racketeering acts against rights, religious freedom, and the other acts, violations, and injuries of these defendants, have and do illegally impose a functional administratively placed bill of attainder in violation of our Constitution, criminal laws, and of 5 U.S.C. § 301, among others, upon these adult and minor child plaintiffs including, without limitation, for their illegal human trafficking and illegal medical experimentation from age 12 or earlier, as in Lead Plaintiff's own direct experience. Defendant UNITED STATES has and does place continuing involuntary constraints and deprivations on these plaintiffs of religious practice and other

constitutional rights directed at and against those targeted persons based upon the religion into which they were born, and for other discriminatory purposes in violation of 5 U.S.C. § 301 Administrative Procedures and of 42 U.S.C. § 2000bb-1:

> "Government may substantially burden a person's exercise of religion only if it demonstrates that application of the burden to the person—
> (1) is in furtherance of a compelling governmental interest; and
> (2) is the least restrictive means of furthering that compelling governmental interest."

C. There is no compelling governmental interest in illegal human medical experimentation on selected members of religious groups discriminatorily chosen for that specific reason, nor on their children and succeeding generations of their families. There is no compelling governmental interest in facilitating the development of an illegal bioweapon and bioweapon delivery systems upon specific religious groups. There is no compelling governmental interest in abusing the state secret privilege to undertake, sustain, and conceal racketeering acts by any conspiracy which includes, or even which would exclude, defendant UNITED STATES, its departments and agencies, as a leader and/or member of such an associated-in-fact enterprise and conspriacy against members of a specific religious group. None of these acts is constitutionally permitted to defendant UNITED STATES. There can be no compelling governmental interests in acts which are not constitutionally permitted to government, nor when those supposed interests have and do exceed the clear intent expressed by Congress to protect these religious rights and the constitutional rights of each and all these US persons, their minor children, and succeeding generations, such as these defendants have and do continue to perpetrate using color of law abuse of state secret privilege and alleged national security regulations for the specific purposes of systematic violations of 5 U.S.C. § 301 (paragraph 260, Interline Exhibit 2).

D. The origins of this fraudulently concealed religious discrimination against four generations of American families is based upon their religious belief in pacifism, and their religious choice not to bear arms in military service, which has been and, as to certain plaintiffs continues to be, practiced by Lead Plaintiff's family at least since his great-great grandfather who served during four years of the Civil War, and who was awarded the Medal of Honor after Appomattox on the defeat of slavery and perpetuated involuntary servitude (so the family believed and America constitutionally ratfied in the *Thirteenth* Amendment). Defendant UNITED STATES (including, without limitation, CIA, ARMY. DOJ, FBI, USMS, NIAID) and its co-conspirators has and does constitutionally and criminally abuse these plaintiffs in its religious discrimination and selection of these families for its illegal human experimentation upon them without informed consent, and in fact, without consent of any kind, and upon their minor children, without consent of any kind (paragraphs 1-27, 350-584), to and including lifetime involuntary servitude (paragraphs 403-424).

E. After faithfully serving as conscientious objectors in defendant ARMY Medical Corps and other military service, these veterans, including Lead Plaintiff's father (the parent of now deceased Sandra at age 11, paragraph 803C-H), and uncle (grandfather of now deceased Audrey at age 18, paragraph 803I-K), and their families of this Quaker-based religious group, have been and are subjected to continuing religious discrimination throughout their lives, and succeeding generations of their minor children born into this religion, which have also been similarly subjected to these acts, violations, and injuries by defendant UNITED STATES. The acts, violations, and injuries, both by active measures, and by its neglect to prevent these constitutional and civil rights violations and crimes including, without limitation, as perpetrated and as fraudulently concealed specifically by defendant DOJ and its police powers agencies, in coordination and conspiracy with other police powers, intelligence, and foreign police powers

and intelligence departments and agencies, and with other known and unknown defendants which acts. violations, injuries, and conspiracies, together with other departments and agencies of defendant UNITED STATES, have persisted secretly for at least 70 years since the first known visit of defendant FBI to the family's home church on a Sunday morning in rural Enumclaw, WA when Lead Plaintiff's mother was a teenager in the early 1950s (paragraph 410-411).

E. This pattern of continual religious discrimination has been and is also fraudulently concealed by subjecting these same families and their individual members to ruinous and lethal racketeering acts perpetrated and perpetuated by defendant UNITED STATES and its co-conspirators. This associated-in-fact enterprise and conspiracy operates in the same continuing patterns of illegal associated-in-fact enterprise racketeering acts and conspiracies which Congress investigated and legislated to outlaw in accordance with the 1975 Senate Intelligence Committee Final Report on CIA's illegal MKUltra program and FBI's illegal Cointelpro program. Those programs perpetrated, sustained, and fraudulently concealed long-running patterns of constitutional rights violations, violence, lethality, discrediting, financial ruin, and other discrimination, undertaken by defendant DOJ and its police powers agencies against the constitutional and statutory rights of US persons (LPEE pages 237-271, 6885-7466) from the 1950s into the 1970s, which have and do continue in the present time in lawless disregard of Congressional intent, as well documented herein.

F. The massive scope and duration of these acts, injuries and violations comprises the entirety of this complaint, from at least 1961 (paragraph 414) to the present day without interruption, all fraudulently concealed behind systematic illegal color of law pretexting, state secret entanglements intended to conceal, and myriad attempts to inculpate these plaintiffs in further state secret privilege matters by defendant UNITED STATES for the purposes of

extending their involuntary servitude, the government's corrupt cover-up abusing the state secret privilege under color of law, and perpetuating the illegal and reckless development of the BRMT bioweapon and bioweapon delivery system. This overall conspiracy specifically includes, without limitation, both illegal acts and neglect to prevent by defendant DOJ, and specifically includes the present Attorney General GARLAND, who has a direct conflict of personal interest with the interests of justice in this matter as he is personally known to the Lead Plaintiff as a direct participant (then known as Robert Mandich, and plausibly previously as Stuart Bettesworth, paragraphs 5, 99m, 211) in this illegal program from 1974-1976, as a result of his identification in January 2024 as a co-resident at Washington State University, Pullman, WA, while defendant BREYER ran the illegal BRMT program posing as resident of Spokane, WA, and which program most probably already included the involuntary servitude of Lead Plaintiff's uncle Bruce's family in nearby Walla Walla, WA, during this time period (paragraph 10, 412, 413, 600B, Interline Exhibit 1).

G. Defendant UNITED STATES and co-conspirator defendants have and do act in systematic fraudulently concealed violations of constitutional rights of free exercise of religion, and the constitutionally guaranteed right that no bill of attainder shall attach by inheritance, whether formally drafted or informally assigned by familial association, to any person, by initially subjecting and then sustaining, without limitation, these defendants' acts, violations, and injuries which have and do include, without limitation, (i) trafficking the Lead Plaintiff to California from Washington state without the knowing consent of the minor child or his parents for illegal human medical experimentation upon him beginning at age 12 (paragraphs 3, 19(i), 417, 492) and continuing without consent into the present day, in violation of Supreme Court mandate *Sherbert v. Verner,* 374 U.S. 398 (1963) and the explicit cause of action therein and, (ii) embedding Lead Plaintiff into their surreptitious cover employment; by (iii) assigning

direct embedded minders into his personal life; by (iv) contriving and orchestrating female companions; by (v) contriving and destroying a marital community; by (vi) orchestrating, creating, and destroying a fraudulent marital community; by (vii) controlling all professional employment from 1979; by (viii) controlling all periods of unemployment from 1989 to the present day; (ix) by controlling and destroying all efforts to independently engage and affect in-state, interstate, and international commerce; (x) by subjecting him without consent to perpetual video and other intrusive surveillance; by (xi) creating and sustaining false public narratives; by (xii) literally putting words in his mouth and thoughts in his mind using the illegal BRMT bioweapon and bioweapon delivery system, among other acts, injuries, and violations at the final subparagraph in this paragraph, both within and without the territory of the United States.

H. A specific purpose of this long-running pattern of fraudulent concealment is the intentional evasion of all accountability for, and fraudulent concealment of, these heinous acts, violations, and injuries to US persons and the religious discrimination against them, as defendant UNITED STATES has and does remain perpetually and willfully blind to all these crimes and rights violations, perpetrated by these defendants' own hands and by the hands of their co-conspirators.

I. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the

Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	Facts - Subcount Series	Subcount(s)
600-603	NSEC National Security Pretexting and Entanglements	1-4
604-620	HEXP Illegal Human Experimentation	1-17
621-637	RGTS Individual Rights Violations and Conspiracies	1-17
639-693	RICO Racketeering	1-55
694-710	LTHL Lethality Attempts	1-17

834. CLAIMS FOR RELIEF - COUNT 34

Violations of Constitutional Rights Under the First, Third, Fourth, Fifth, Thirteenth, Fourteenth Amendments

Posse Comitatus - Use of Military To Violate Constitutional Rights

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. § 1385
Washington:	RCW § 49.060.030(1)
New Jersey:	NA
New York:	NA
California:	NA
Massachusetts:	NA
Arizona:	NA
Texas:	NA
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph. as well as state statutes in all originating locations, many of which are unknown at the time of this complaint and will be available upon discovery.

B. Defendants have and do plan, conspire, perpetrate and engage in illegal color of law acts against rights and law in pursuit of the continued illegal development of its illegal BRMT bioweapon and bioweapon delivery system using illegal human subject medical experiments on these involuntary plaintiffs, defendant UNITED STATES has and does violate the human, Constitutional, and civil rights of Lead Plaintiff, and similarly situated plaintiffs, by its use of active duty military personnel in civilian dress to effectuate and perpetuate its continued illegal BRMT bioweapon and bioweapon delivery system program, constitutional, civil, and human rights violations, and associated-in-fact enterprise pattern of racketeering acts, violations, and injuries of these plaintiffs. Defendant UNITED STATES has and does use personnel, infrastructure, and facilities of the Department of Defense (DOD, DARPA, and others unknown), including, without limitation, active and reserve duty soldiers of the ARMY, NAVY, AIR FORCE, SPACE FORCE both in military dress and concealed in civilian dress, and specific infrastructure of the Air Force, Space Force, National Reconnaissance Office, National Security Agency, Navy, and other unknown departments and agencies, in its violation of 18 U.S.C. § 1385:

> "Whoever, except in cases and under circumstances expressly authorized by the Constitution or Act of Congress, willfully uses any part of the Army, the Navy, the Marine Corps, the Air Force, or the Space Force as a posse comitatus or otherwise to execute the laws….,"

to engage with co-conspirators in color of law entrapments, criminal pretexting, to aid and abet its operation of the illegal BRMT bioweapon and bioweapon delivery system for decades, and to conspire with other defendants, known and unknown, for these corrupt purposes, and to violate human, constitutional, and civil rights of this class of plaintiffs, both within and without the territory of the United States. Defendant UNITED STATES has and does violate the *Third* Amendment, illegally conspiring to and forcing the quartering of soldiers in the private residences of the Lead Plaintiff by its illegal orchestrations for involuntary servitude perpetrated by defendants including, without limitation, CIA, ARMY, DOD, DOJ, USMS, FBI, BURNS, WATERS, FAUCI. Defendant UNITED STATES has and does violate the *Ninth* Amendment unenumerated right to "blessings of liberty to ourselves and our posterity" (Constitution) – by its general searches, and through its oppressive and tyrannical direct daily interference in the private affairs, personal business, and property of the Lead Plaintiff and others of this class of plaintiffs.

C. Defendant UNITED STATES has and does engage in a persistent pattern of color of law abuses in the field operations of the illegal BRMT bioweapon and bioweapon delivery system, and has and did deliberately conspire to maneuver military personnel into the civilian life of Lead Plaintiff through a specific conspiracy of color of law fraudulent acts by defendant UNITED STATES for that specific purpose in (i) his trafficking from employment at Deloitte Seattle to LazerSoft reporting to STONE (CIA) as a peer to WILKINS (ARMY, WA ANG) in 1986, followed by the programmed destruction of Lead Plaintiff's marriage to Lynne (paragraph 609 HEXP-6) using the illegal BRMT bioweapon and bioweapon system to boost Lynne's oxytocin in the presence of adulterer SWAIN) in 1987-1988, causing their divorce and destruction of that marital community, orchestrated by defendant BURNS (CIA), then the fraudulent orchestration of Jeanette, an active duty ARMY soldier in civilian dress only into Lead Plaintiff's life to engage in a fraudulent relationship while she was under duress and

fraudulent concealment, paragraph 610 HEXP-7, and he was under the illegal control of and servitude to defendant UNITED STATES and the malign and concealed biochemical manipulations of the illegal BRMT bioweapon and bioweapon delivery system and the abuse of hijacked oxytocin hormones.

D. These illegal acts were perpetrated by defendants ARMY and CIA for the specific corrupt purpose of orchestrating the introduction of an enlisted military member who had been thereby deliberately inculpated in sensitive national security matters in the Middle East, then exposed as a bisexual in military service and threatened with criminal prosecution, then orchestrated as the prospective partner to Lead Plaintiff in 1988 by WATERS (paragraph 610 HEXP-7) for the specific corrupt and illegal purpose of evading posse comitatus law 18 U.S.C. § 1385 by this color of law abuse, as perpetrated and conspired by departments and agencies of defendant UNITED STATES, specifically including, without limitation, DOD, DARPA, ARMY, CIA, FBI, USMS, BURNS, WATERS, ROSENBERG, and unknown others. Specifically, and without limitation, defendant UNITED STATES, through this orchestration of the destruction of the marital community with Lynne (paragraph 609 HEXP-6) for the corrupt purpose of assigning an active duty member of the military as the Lead Plaintiff's second spouse, Jeanette, for its continued illegal abuse of the BRMT bioweapon and bioweapon delivery system against Lead Plaintiff, and during which it specifically assigned, as members of the conspiracy other active duty members of the military (including, without limitation Alexander and Yvgeney VINDMAN, with family members in tow) posing as extended family of spouse Jeanette, among other acts, injuries, and violations at the final subparagraph in this paragraph, both within and without the territory of the United States, and as referenced throughout this complaint (paragraphs 440, 498-499, 600K NSEC-1, 610 HEXP-7).

E. Through these surreptitious military deployments in civilian dress, defendant UNITED STATES incorporated active military personnel illegally into civilian life, in proximity to the Lead Plaintiff while he was being subjected to various illegal BRMT bioweapon and bioweapon delivery system hijackings together with fraudulently orchestrates spouse Jeanette and stepson Bryce, in undercover roles with no legal basis for violations of the *Third* Amendment and 18 U.S.C. § 1385, nor its subsequently perpetrated violations through the temporary employment of AUSTIN and unknown other military personnel at CNA between 1996-2002.

F. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	Facts - Subcount Series	Subcount(s)
600-602	NSEC National Security Pretexting and Entanglements	1-3
604-620	HEXP Illegal Human Experimentation	1-17
626, 630-632	RGTS Individual Rights Violations and Conspiracies	6, 10-12
639	RICO Racketeering	1
694-710	LTHL Lethality Attempts	1-17

835. CLAIMS FOR RELIEF - COUNT 35

Violations of Constitutional Rights Under the First, Fourth, Fifth, Eighth, Thirteenth, Fourteenth Amendments

Involuntary Servitude- Title 42 Civil Rights

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	42 U.S.C. §§ 1981, 1985
Washington:	RCW § 49.60.030(1)a
New Jersey:	NJ Stat §§ 2C:13-8, 2C:41-1 through 2C:41-6, 10:5-4, 10:5-12, 10:6-2
New York:	NA
California:	Cal Penal Code §§ 236, 236.1(a) Cal Labor Code §§ 2801, 2802 Cal Civil Code §§ 1708-1725
Massachusetts:	Mass Gen L ch 265 § 51
Arizona:	AZ Rev Stat § 13-1308
Texas:	TX Penal Code § 20A.02
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Paragraph 820C through AA, paragraph 821C through I, and paragraph 822C and D are specifically incorporated herein for their particular relevance to this paragraph 835. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph. as well as state statutes in all originating locations, many of which are unknown at the time of this Complaint and will be available upon discovery.

B. Defendants have and do plan, conspire, perpetrate and engage in violations of the Thirteenth Amendment which prohibits involuntary servitude directed at any person by any

person, with the only exception being upon a conviction by due process respecting rights. Involuntary servitude is a pattern of pervasive coercion by force by another. **Coercion** is "the practice of persuading someone to do something by using force or threats" (as defined by the Cambridge Dictionary online). Such coerced persons are the involuntary servants of that or those other party(ies) when coercion and force are broadly applied, whether or not the targeted person being forcibly coerced is even aware of the specific methods of coercion being used by the coercer(s).

C. Coercive force does not require any knowledge or understanding by the coerced person of any specific intention by the coercer to apply any force, including the forcing of an act by the coercer's election to foreclose preferable options when those coercive methods are applied by any surreptitious means available to the coercer. Government possesses myriad means of surreptitious forced coercion by both (a) its valid exercise of its legal authority in the use of surreptitious police powers tools, and (b) by any illegal exercise of those same police powers tools under color of law. These defendants, particularly, without limitation, defendant UNITED STATES, it departments and agencies, and the individual officials, officers, agents, and employees thereof, have engaged in a profoundly broad and durable surreptitious pattern of illegal acts, violations, and injuries of constitutional rights for decades, all fraudulently concealed by profound abuses of the state secret privilege (paragraph 260-271), for the entire set of purposes and intentions (*mens rea*) identified in all claims at paragraphs 801-854.

D. These decades long pattens of coercive exercise of police powers, as regard both these police powers defendants' own acts, violations, and injuries to these plaintiffs, and as regards the acts, violations, and injuries it permits others to undertake jointly and/or severally through privileged access such as members of the press, media, and entertainment industry who are defendants herein, and in the knowing failures of police powers to protect these

plaintiffs, are all knowing and willful abuses of the constitutional rights of these plaintiffs in their associated-in-fact enterprise pattern of acts, violations, racketeering acts, and injuries to constitutional rights.

E. These plaintiffs have and do act in good faith in their exercise of their constitutional rights of free exercise of religion, and of all other rights; have and do faithfully serve their nation when called to duty; have and do engage in ordinary jobs, careers, commerce, and interstate commerce in a fair and reasonable manner; have and do conduct their lives in the manner expected of good citizens.

F. The proper constitutional role of government includes, without limitation, defendant UNITED STATES' direct and explicit duties to (i) specifically and affirmatively secure these plaintiffs' rights to free exercise of their religious beliefs as conscientious objectors not to bear arms when called into military service, and to (ii) establish justice, which includes securing all their rights of free expression, free will, and action, as declared in establishing our nation: "that to secure these rights, governments are instituted among men…," *Declaration of Independence*, 1776. These plaintiffs and their posterity, including the Lead Plaintiff, have instead been used as the involuntary servants of government (human guinea pigs, lab rats, and human sacrifices in illegal medical experiments and development of the illegal BRMT bioweapon and bioweapon delivery system) in its pursuit of acts which are illegal under our Constitution, laws, and ratified treaties, by using these plaintiffs (i) as the subjects of illegal human medical experiments, which acts are specifically chargeable and indictable as crimes, (ii) to sustain the illegal cover-up of other of its own criminal acts against still other citizens exercising their rights, and (iii) as the government's human prey, by setting upon these plaintiffs and subjecting them to coercion, while these citizens of this class of plaintiffs have

and do conduct themselves in accordance with their religious beliefs and without harm or malice toward others.

G. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	**Facts - Subcount Series**	**Subcount(s)**
600-603	NSEC National Security Pretexting and Entanglements	1-4
604-620	HEXP Illegal Human Experimentation	1-17
621-637	RGTS Individual Rights Violations and Conspiracies	1-17
639-693	RICO Racketeering	1-55
694-710	LTHL Lethality Attempts	1-17

836. CLAIMS FOR RELIEF - COUNT 36

Violations of Constitutional Rights Under the First, Third, Fourth, Fifth, Eighth, Thirteenth, Fourteenth Amendments

Intentional Discrimination in Employment

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	42 U.S.C. §§ 1981
Washington:	RCW § 49.60.030(1)a
New Jersey:	NJ Stat §§ 2C:13-8, 2C:41-1 through 2C:41-6, 10:1-1, 10:5-4, 10:5-12, 10:6-2
New York:	NA
California:	Cal Penal Code §§ 236, 236.1(a) Cal Labor Code §§ 2801, 2802 Cal Civil Code §§ 1708-1725
Massachusetts:	Mass Gen L ch 265 § 51
Arizona:	NA
Texas:	NA
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Paragraph 820C through AA, paragraph 821C through I, and paragraph 822C and D are particularly incorporated herein for specific relevance to this paragraph 836. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph. as well as state statutes in all originating locations, many of which are unknown at the time of this Complaint and will be available upon discovery.

B. Defendants have and do plan, conspire, perpetrate and engage in intentional discrimination in employment. The only work Lead Plaintiff has been allowed to undertake since his college undergraduate degree was awarded in June 1977, has been employment specifically permitted to the unwitting Lead Plaintiff by defendant UNITED STATES in its intentional discrimination in employment rights using various surreptitious means to perpetuate its involuntary servitude, originating in religious discriminations against Lead Plaintiff, his family

of origin, and extended family. Among other acts, injuries, and violations at the final subparagraph in this paragraph, both within and without the territory of the United States, defendants have and do act in violation of federal and state criminal and civil rights statutes throughout the Lead Plaintiff's work life and professional career from 1977 when he was first professionally employed by the Spokane General Agency of John Hancock Insurance (defendant FBI), then by Washington State University (defendant CIA embed Dr. Paul Shaffer), then Deloitte Seattle (defendants USMS, FBI, CIA), and so forth (paragraphs 419-489, 600-603 NSEC-1-4, LPEE pages 140-236) as recounted herein to June 2008, when his career and his ability to earn any income whatsoever in any form was terminated by defendant UNITED STATES after its fraudulent employment of Lead Plaintiff by cover company defendant ESTABLISH (ROSENBERG, FBI), acting in its own corrupt interests before orchestrating his kidnapping (paragraph 808) and further human trafficking through Bergen Regional psychiatric wards for six months, while housing was continuously available, to effect duress-driven relinquishment of legal claims (paragraphs 522, 523), and in 2108 his further human trafficking into yet another national security entanglement, the national security and public corruption investigation in Edgewater, NJ involving Senator Menendez and co-defendants by defendant FBI (paragraphs 524, 624 RGTS-4). Defendants DOJ and FBI, and persons who have left defendant DOJ for the media industry and for other professions, such as defendants MELBER, ROSENBERG, WEISSMAN, RUBIN, and unknown others have and do, by direct and indirect frauds and other actions under color of law, prohibit all employment and entrepreneurial activities from being freely undertaken and pursued by Lead Plaintiff since that time, thereby perpetuating their associated-in-fact enterprise pattern of racketeering acts, systematically violating rights, and costing the Lead Plaintiff millions of dollars in lost direct personal compensation. These acts, violations, and injuries in the intentional discrimination of permanent

unemployment since June 2008, are in addition to their prior active control of direct compensation, of periods of unemployment and other deprivations, and thefts and frauds on Lead Plaintiff's business enterprises, and his personal, financial, real, and intangible property from 1972 through June 2008. These persistent patterns of rights violations, intentional discrimination in employment, and associated-in-fact enterprise patterns of racketeering acts, have and do continue defendant UNITED STATES and co-conspirator defendants' perpetual pattern of involuntary servitude including, without limitation, surreptitious employment, deprivation of alternative employment opportunities, secret co-investments and share ownership, and assigned illegally embedded partners in his businesses, workplaces, and personal life. This illegal conduct meets and exceeds the criminal legal definitions of involuntary servitude at 18 U.S.C. § 1584, of peonage at 18 U.S.C. § 1581, of forced labor at 18 U.S.C. § 1589, is classified as serious harm under 18 U.S.C. § 1589(c)(2), as human trafficking at 18 U.S.C. § 1590, and is a severe form of human trafficking under 22 U.S.C. § 7102 (11) in the duration, scope, and extent of its illegal conduct against the Lead Plaintiff in 44 states and multiple foreign nations from 1968 to the present. Since defendant DOJ and its agencies are directly involved in this intentional discrimination, as they have been since inception, they decline to prosecute these serial crimes and perpetuate their willful blindness (paragraphs 307-317, 550-584) and the direct conflict of their institutional interest with the interests of justice for these plaintiffs and for the People.

C. Defendant UNITED STATES and co-conspirator defendants have and do act in systematic violations of constitutional rights by subjecting and sustaining illegal methods of intentional discrimination in employment by, without limitation, (i) embedding Lead Plaintiff into their surreptitious cover employment; by (ii) assigning direct embedded minders into his personal life; by (iii) controlling all professional employment from 1977; by (iv) controlling all periods of unemployment from 1978 to the present day; (v) by controlling and destroying all

efforts to engage in independent in-state, interstate, and international commerce; (vi) by subjecting him without consent to perpetual video and other intrusive surveillance; (vii) by creating and sustaining false public narratives; (viii) by literally putting words in his mouth and thoughts in his mind using the illegal BRMT bioweapon and bioweapon delivery system. These acts, violations, and injuries are representative of those to this class of plaintiffs.

D. In furtherance of this conspiracy, defendants have and do act in violation of federal statutes and the state laws of at least 44 states physically visited by Lead Plaintiff, and in violation of international laws and treaties, all as perpetrated by defendant UNITED STATES and its defendant co-conspirators:

(i) pretexting and acts, violations, and injuries directed at Lead Plaintiff and other members of this class of plaintiffs; by defendant UNITED STATES' election in its illegal discretionary acts in (ii) permitting, enlisting, empowering, and/or enabling domestic and foreign fraudulent actors electronically screened in by defendants, (iii) permitting, enlisting, empowering, and/or enabling foreign intelligence services of countries pretexted and/or physically visited by Lead Plaintiff, and/or (iv) pretexted regarding Lead Plaintiff to cause other discriminatory illegal acts targeting Lead Plaintiff, and/or other members of this class of plaintiffs, in violation of US law and of their own laws, and of any reasonable standard of practice, in

(a) their series of schemes, conspiracies, injuries, and deprivations of rights, and of (b) deprivations of Privileges and Immunities, including, without limitation, (b-i) Lead Plaintiff's rights to free, equal, and non-discriminatory access to acquire, possess, retain, and enjoy all forms of property, including those rights to same as guaranteed under ratified international treaties, and (b-ii) including such rights as they relate to employment, interstate commerce, and to closely held business entities. Defendants have

and do injure the Lead Plaintiff and other members of the class by such deprivations of rights. Locations and particular details of many of these acts, violations, and injuries are unknown at the time of this Complaint subject to discovery.

E. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	**Facts - Subcount Series**	**Subcount(s)**
600-603	NSEC National Security Pretexting and Entanglements	1-4
616	HEXP Illegal Human Experimentation	13
622-625, 627, 629-631	RGTS Individual Rights Violations and Conspiracies	2-5, 7, 9-11
639-693	RICO Racketeering	1-55
	LTHL Lethality Attempts	

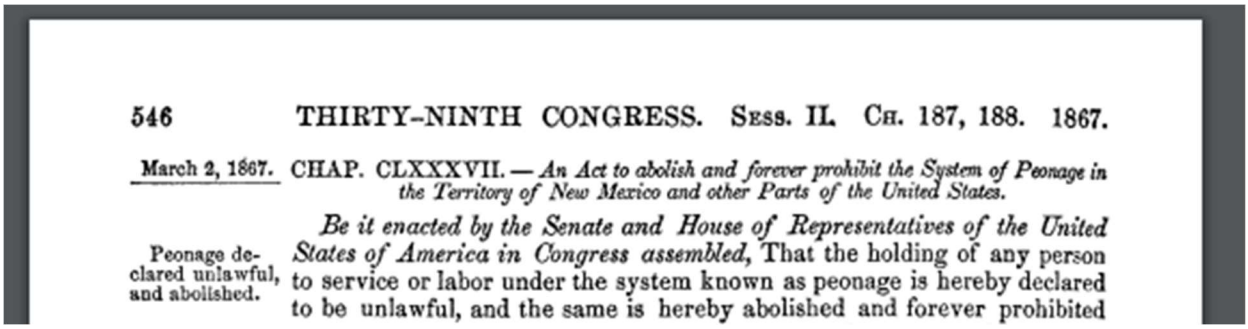
837. CLAIMS FOR RELIEF - COUNT 37

Violations of Constitutional Rights Under the First, Fourth, Fifth, Eighth, Thirteenth, Fourteenth Amendments

Peonage Abolished - Title 42 Civil Rights

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	42 U.S.C. §§ 1981, 1994
Washington:	RCW § 49.60.030(1)a
New Jersey:	NJ Stat §§ 2C:13-8, 2C:41-1 through 2C:41-6, 10:1-1, 10:5-4, 10:5-12, 10:6-2
New York:	NA
California:	Cal Penal Code §§ 236, 236.1(a) Cal Labor Code §§ 2801, 2802 Cal Civil Code §§ 1708-1725
Massachusetts:	Mass Gen L ch 265 § 51
Arizona:	AZ Rev Stat § 13-1308
Texas:	TX Penal Code § 20A.02
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Paragraph 820C through AA, paragraph 821C through I, and paragraph 822C and D are particularly incorporated herein for specific relevance to this paragraph 837. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph. as well as state statutes in all originating locations, many of which are unknown at the time of this complaint and will be available upon discovery. The Peonage Act abolished and prohibited this practice in 1867:



546 THIRTY-NINTH CONGRESS. SESS. II. CH. 187, 188. 1867.

March 2, 1867. CHAP. CLXXXVII. — *An Act to abolish and forever prohibit the System of Peonage in the Territory of New Mexico and other Parts of the United States.*

Peonage declared unlawful, and abolished.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That the holding of any person to service or labor under the system known as peonage is hereby declared to be unlawful, and the same is hereby abolished and forever prohibited

See full text of Peonage Act at paragraph 821.

B. Defendants have and do plan, conspire, perpetrate and engage in violations of the Thirteenth Amendment prohibits involuntary servitude, which includes peonage defined as holding of any person to service or labor. Peonage is "any form of wage labor, financial exploitation, coercive economic practice, or policy in which the victim or a laborer (peon) has little control over employment or economic conditions" (Wikipedia). Defendant UNITED STATES has and does engage in violations of the statutory prohibition on peonage 42 U.S.C. §§ 1981, 1994 by means of the abuse of law and legal process under color of law, through its abuse of police powers in the patterns of racketeering acts conducted by the associated-in-fact enterprise, which it has and does perpetrate, and has and does perpetuate both severally and jointly with other co-conspirator defendants. This illegal conduct meets and exceeds the criminal legal definition of involuntary servitude at 18 U.S.C. § 1584, of peonage at 18 U.S.C. § 1581, of forced labor at 18 U.S.C. § 1589, is classified as serious harm under 18 U.S.C. § 1589(c)(2), as human trafficking at 18 U.S.C. § 1590, and is a severe form of human trafficking under 22 U.S.C. § 7102 (11) in the duration, scope, and extent of its illegal conduct against the Lead Plaintiff in 44 states and multiple foreign nations from 1968 to the present. Since defendant DOJ and its agencies have been and are directly involved in perpetrating this conduct, it has and does willfully refuse to investigate and charge these crimes and turns its blind eye to this conduct by its own agencies and by other co-conspirator defendants.

C. Defendants have and do act in violation of the above referenced statutes throughout the Lead Plaintiff's personal and work life, and his education and professional career, from at least 1968 to the present.

D. Defendant UNITED STATES and its co-conspirators have and do act, violate, and injure Lead Plaintiff and other members of this class of plaintiffs through, without limitation, surreptitious employment, assigned and dictated employment and compensation, direct and indirect control of the duration, location, and extent of employment periods, unemployment periods, deprivation of alternative employment opportunities, through systematic enterprise wreckings to total destruction, bankruptcy, and liquidation, thefts and frauds on business enterprises, flawed and fraudulent software implementations, surreptitious financial control, secret co-investments and share ownership, fraudulent banking and credit relationships, assignment of illegally embedded partners and employees in businesses, workplaces, interposition of fraudulent business opportunities, exclusion from actual business opportunities, delays and accelerations of contracts to exacerbate cash flow problems, fraudulent bid and performance bonding, deprivation of governmental small business benefits, and of other ordinary commercial benefits to which these enterprises were and are legally entitled.

E. Lead Plaintiff's career and all ability to earn independent income were ended in June 2008 by defendant UNITED STATES and its co-conspirator defendants in their own corrupt interests, and which defendants have and do by their direct and indirect acts of frauds and other actions under color of law since that time, effectively prohibited all employment and entrepreneurial activities from being freely undertaken and pursued by Lead Plaintiff, thereby perpetuating its associated-in-fact enterprise pattern of racketeering acts, violating rights, and costing the Lead Plaintiff millions of dollars in lost direct personal compensation.

F. Defendant UNITED STATES and its co-conspirators have and do act, violate, and injure Lead Plaintiff and other members of this class of plaintiffs and their personal, psychological, emotional, and property interests through, without limitation, destruction of marital communities and families, entrapment attempts, physical and emotional injuries approaching death by illness, deep vein thrombosis, and direct illegal BRMT bioweapon and bioweapon delivery system hijacking, to drive defendant UNITED STATES and its co-conspirators myriad attempts to inflict lethality remotely and through indirect means, through their acts, violations, and injuries directed at personal, financial, real, and intangible property from 1972 to present, as described at paragraph 830D, and psychologically and emotionally through defendants' sequences of psychopathic coercion and violence described at paragraph 820, through harassment while attempting to secure, and through specific deprivations, of personal benefits legally entitled such as unemployment compensation, government housing support, and health care, all as particularly described in the paragraphs referenced in the table at the last subparagraph in this paragraph.

H. Defendant UNITED STATES and co-conspirator defendants have and do act in systematic fraudulently concealed violations of constitutional rights by initially subjecting and then sustaining illegal searches by, without limitation, (i) embedding Lead Plaintiff into their surreptitious cover employment; by (ii) assigning direct embedded minders into his personal life; by (iii) contriving and orchestrating female companions; by (iv) contriving and destroying a marital community; by (v) orchestrating, creating, and destroying a fraudulent marital community; by (vi) controlling all professional employment from 1977; by (vii) controlling all periods of unemployment from 1978 to the present day; (viii) by controlling and destroying all efforts to engage in independent in-state, interstate, and international commerce; (ix) by subjecting him without consent to perpetual video and other intrusive surveillance; by (x)

creating and sustaining false public narratives; by (xi) literally putting words in his mouth and thoughts in his mind using the illegal BRMT bioweapon and bioweapon delivery system. These acts, violations, and injuries are representative of those to this class of plaintiffs.

I. This pattern of peonage is part of these defendants' pattern of racketeering acts directed at the Lead Plaintiff in all matters of life through a system of fraud-based virtual restraints and assigned and designated circumstances to the Lead Plaintiff as specifically cited and described at paragraphs 419 through 534, among other acts, injuries, and violations at the final subparagraph in this paragraph. In furtherance of this conspiracy, defendants have and do act in violation of federal statutes and the state laws of at least 44 states physically visited by Lead Plaintiff, and in violation of international laws and treaties, all as perpetrated by defendant UNITED STATES and its defendant co-conspirators:

(i) pretexting and acts, violations, and injuries directed at Lead Plaintiff and other members of this class of plaintiffs; by defendant UNITED STATES' election in its illegal discretionary acts in (ii) permitting, enlisting, empowering, and/or enabling domestic and foreign fraudulent actors electronically screened in by defendants, (iii) permitting, enlisting, empowering, and/or enabling foreign intelligence services of countries pretexted and/or physically visited by Lead Plaintiff, and/or (iv) pretexted regarding Lead Plaintiff to cause other discriminatory illegal acts targeting Lead Plaintiff, and/or other members of this class of plaintiffs, in violation of US law and of their own laws, and of any reasonable standard of practice, in

(a) their series of schemes, conspiracies, injuries, and deprivations of rights, and of (b) deprivations of Privileges and Immunities, including, without limitation, (b-i) Lead Plaintiff's rights to free, equal, and non-discriminatory access to acquire, possess, retain, and enjoy all forms of property, including those rights to same as guaranteed under

ratified international treaties, and (b-ii) including such rights as they relate to employment, interstate commerce, and to closely held business entities. Defendants have and do injure the Lead Plaintiff and other members of the class by such deprivations of rights. Locations and particular details of many of these acts, violations, and injuries are unknown at the time of this Complaint subject to discovery.

J. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	Facts - Subcount Series	Subcount(s)
600-603	NSEC National Security Pretexting and Entanglements	1-4
604-620	HEXP Illegal Human Experimentation	1-17

621-637	RGTS Individual Rights Violations and Conspiracies	1-17
639-693	RICO Racketeering	1-55
694-710	LTHL Lethality Attempts	1-17

838. CLAIMS FOR RELIEF - COUNT 38

Violations of Constitutional Rights Under the First, Third, Fourth, Fifth, Thirteenth, Fourteenth Amendments

Conspiracy Against Rights

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	5 U.S.C. § 552; 42 U.S.C. §§ 1981, 1985
Washington:	RCW § 49.060.030(1)
New Jersey:	NJ Stat §§ 10:1-1, 10:5-4, 10:5-12, 10:6-2
New York:	New York Penal L. §§ 105.15, 460.00 through 460.80; New York Pub Off L § 95
California:	NA
Massachusetts:	NA
Arizona:	NA
Texas:	NA
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of constitutional rights, federal and state statutes listed above in this paragraph, as well as state statutes in all originating locations, many of which are unknown at the time of this Complaint and will be available upon discovery.

B. Defendants have and do plan, conspire, perpetrate and engage in (i) pretexting and acts, violations, and injuries directed at Lead Plaintiff and other members of this class of plaintiffs; by defendant UNITED STATES' election in its illegal discretionary acts in (ii) permitting, enlisting, empowering, and/or enabling domestic and foreign fraudulent actors electronically screened in by defendants, (iii) permitting, enlisting, empowering, and/or enabling foreign intelligence services of countries pretexted and/or physically visited by Lead Plaintiff,

and/or (iv) pretexted regarding Lead Plaintiff to cause other discriminatory illegal acts targeting Lead Plaintiff, and/or other members of this class of plaintiffs, in violation of US law and of their own laws, and of any reasonable standard of practice, in (a) their series of schemes, conspiracies, injuries, and deprivations of rights, and of (b) deprivations of Privileges and Immunities, including, without limitation:

(b-i) Lead Plaintiff's rights to free, equal, and non-discriminatory access to acquire, possess, retain, and enjoy all forms of property, including those rights to same as guaranteed under ratified international treaties, and

(b-ii) such rights as they relate to employment, interstate commerce, and to closely held business entities.

Defendants have and do injure the Lead Plaintiff and other members of the class by such deprivations of rights. Locations and particular details of many of these acts, violations, and injuries are unknown at the time of this complaint subject to discovery.

C. Defendant UNITED STATES and co-conspirator defendants have and do act in systematic violations of constitutional rights in a conspiracy against rights by, without limitation, (i) embedding Lead Plaintiff into their surreptitious cover employment; by (ii) assigning direct embedded minders into his personal life as co-residents and assigned family members; by (iii) contriving and orchestrating female companions; by (iv) contriving and destroying a marital community in 1987-1988; by (v) orchestrating a relationship in 1988, then creating, and destroying a fraudulent marital community in 1990-2005; by (vi) controlling all professional employment from 1977; by (vii) controlling all periods of unemployment from 1978 to the present day; (viii) by controlling and destroying all his efforts to engage in independent in-state, interstate, and international commerce; (ix) by subjecting him without consent to perpetual video and other intrusive surveillance; by (x) creating and sustaining false public narratives including

of terrorism and other imaginary offensive behaviors create personal endangerment of injury or death from among the general public, after entrusting their minor children to his custody and care over many years; by (xi) precluding, preventing, stymying and misdirecting his volunteer efforts and attendance at public events and peaceable assemblies to create, further, and sustain false public narratives, and by (xii) literally putting words in his mouth and thoughts in his mind using the illegal BRMT bioweapon and bioweapon delivery system. These acts, violations, and injuries are representative of those to this class of plaintiffs.

D. The primary purposes of this conspiracy against rights are to sustain the conspiracy itself against these plaintiffs for the continued purposes of (i) the development and deployment of the illegal BRMT bioweapon and bioweapon using illegal human subject experimentation on these plaintiffs and to sustain the cover-up of the involvement of defendant UNITED STATES, to (ii) continue the associated-in-fact enterprise and pattern of racketeering acts, and (iii) sustain the political cover-up which initially authorized and has and does sustain the continued illegal conduct so as to avoid and evade political accountability for its authorization, funding, and systematic violations of religious and other constitutional rights by the executive and by senior members of Congress who have had knowledge of this illegal program for decades and persist in political leadership positions.

E. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the

Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	Facts - Subcount Series	Subcount(s)
600-603	NSEC National Security Pretexting and Entanglements	1-4
604-620	HEXP Illegal Human Experimentation	1-17
621-637	RGTS Individual Rights Violations and Conspiracies	1-17
639-693	RICO Racketeering	1-55
694-710	LTHL Lethality Attempts	1-17

839. CLAIMS FOR RELIEF - COUNT 39

Violations of Constitutional Rights Under the First, Third, Fourth, Fifth, Thirteenth, Fourteenth Amendments

Deprivation of Rights – Equal Protection

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	5 U.S.C. § 301; 18 U.S.C. §§ 1961-1968; 42 U.S.C. § 1981
Washington:	RCW § 49.60.030(1)
New Jersey:	NJ Stat §§ 10:1-1, 10:5-4, 10:5-12, 10:6-2
New York:	New York Penal L. §§ 105.15, 460.00 through 460.80; New York Pub Off L § 95
California:	NA
Massachusetts:	NA
Arizona:	NA
Texas:	NA
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph. as well as state statutes in all originating locations, many of which are unknown at the time of this Complaint and will be available upon discovery,

B. Defendants have and do plan, conspire, perpetrate and engage in color law abuses of equal protection afforded under our Constitution. All US persons are entitled to equal protection of the laws. Neither equal nor unequal predations of rights were intended as the primary purpose of any government, whether by defendant UNITED STATES or any state or locality. Despite the explicit constitutional prohibitions on governmental predations of individual rights, Privileges and Immunities, which were specifically required in 1788 by those concerned about liberty and overreach by a powerful federal government for ratification of the Constitution, and which directly led to the 1791 ratification of the Bill of Rights, defendant UNITED STATES and co-conspirator defendants have and do act in a long-running pattern of direct and systematic violations of constitutional rights to equal protection and in violations of other rights from at least 1968, by perpetrating and sustaining defendant UNITED STATES' discriminatory pattern of unequal protection against these plaintiffs in their practices of religion, commerce, assembly and other ***unalienable individual Constitutional rights, Privileges and Immunities*** while fraudulently concealing its own and co-conspirators' criminal conduct behind its color of law abuse of the **Congressionally *conditioned privilege of state secret*** and behind the *willful blindness* of defendant DOJ, which has and does sustain complete official silence and refuse all prosecutions of these institutional criminal offenses against these plaintiffs despite the repeated specific and direct pleas of these plaintiffs delivered in writing and by hand complete with the

prima facie evidence of criminal offenses against rights in durable and systematic violations of 18 U.S.C. §§ 241, 242, among others, at paragraphs 800-854 and as referenced therein.

C. Defendant UNITED STATES and co-conspirator defendants have and do act in systematic violations of constitutional rights in a conspiracy against rights by, without limitation, (i) embedding Lead Plaintiff into their surreptitious cover employment (paragraphs 600 NSEC-1, 639 RICO-1); by (ii) assigning direct embedded minders into his personal life as co-residents and assigned family members (paragraphs 490-532); by (iii) contriving and orchestrating female companions (paragraphs 608-614 HEXP-5-11); by (iv) destroying a marital community in 1987-1988 (paragraphs 609 HEXP-6); by (v) contriving and orchestrating a fraudulent relationship in 1988, then creating, and destroying a fraudulent marital community in 1990-2005 (paragraph 610 HEXP-7); by (vi) controlling all professional employment from 1977 (paragraphs 600-603 NSEC-1-4, 639, 640 RICO-1-2); by (vii) controlling all periods of unemployment from 1989 to the present day (paragraphs 600-603 NSEC-1-4, 639, 640 RICO-1-2); (viii) by controlling and destroying all his efforts to engage in independent in-state, interstate, and international commerce (paragraphs 649-693 RICO-11-55); (ix) by subjecting him without consent to perpetual video and other intrusive surveillance (paragraphs 629, 630 RGTS-9-10); by (x) creating and sustaining false public narratives including of terrorism and other imaginary offensive behaviors create personal endangerment of injury or death from among the general public, after entrusting their minor children to his custody and care over many years (paragraph 853); by (xi) precluding, preventing, stymying and misdirecting his volunteer efforts and attendance at public events and peaceable assemblies to create, further, and sustain false public narratives (paragraphs 526); and by (xii) literally putting words in his mouth and thoughts in his mind using the illegal BRMT bioweapon and bioweapon delivery system (paragraphs 607, 608,

612, 613, 615, 619 HEXP-4, 5, 9, 10, 16). These acts, violations, and injuries to rights, Privileges and Immunities of Lead Plaintiff, are representative of those to this class of plaintiffs.

D. These acts, violations, and injuries have been and are perpetrated by defendant UNITED STATES, and by its co-conspirators, whether witting or unwitting in any particular moment, in direct and explicit unequal treatment and unequal protection. In furtherance of this conspiracy, defendants have and do act in violation of federal statutes and the state laws of at least 44 states physically visited by Lead Plaintiff, and in violation of international laws and treaties, all as perpetrated by defendant UNITED STATES and its defendant co-conspirators:

(i) pretexting and acts, violations, and injuries directed at Lead Plaintiff and other members of this class of plaintiffs; by defendant UNITED STATES' election in its illegal discretionary acts in (ii) permitting, enlisting, empowering, and/or enabling domestic and foreign fraudulent actors electronically screened in by defendants, (iii) permitting, enlisting, empowering, and/or enabling foreign intelligence services of countries pretexted and/or physically visited by Lead Plaintiff, and/or (iv) pretexted regarding Lead Plaintiff to cause other discriminatory illegal acts targeting Lead Plaintiff, and/or other members of this class of plaintiffs, in violation of US law and of their own laws, and of any reasonable standard of practice, in

(a) their series of schemes, conspiracies, injuries, and deprivations of rights, and of (b) deprivations of Privileges and Immunities, including, without limitation, (b-i) Lead Plaintiff's rights to free, equal, and non-discriminatory access to acquire, possess, retain, and enjoy all forms of property, including those rights to same as guaranteed under ratified international treaties, and (b-ii) including such rights as they relate to employment, interstate commerce, and to closely held business entities. Defendants have and do injure the Lead Plaintiff and other members of the class by such deprivations of

rights. Locations and particular details of many of these acts, violations, and injuries are unknown at the time of this Complaint subject to discovery.

Defendants UNITED STATES, ZOULAS, CORNWELL, ROSENBERG; cover companies ESTABLISH (ROSENBERG, ROSS), ABT (HABERER), DC INTERNATIONAL (DALEUSKI), ASSURE GROUP (VANGCHHIA) and those undercover agents (including, without limitation, as parenthetically noted in this subparagraph) acting as principals of those cover companies; WALMART (BALDWIN, MCCORMICK), COSTCO (PADILLA, HUSKEY), and unknown others to be identified during discovery, engaged these co-conspirators in its series of schemes, conspiracies, injuries, and deprivations of rights, Privileges and Immunities, including, without limitation, against:

(a) rights to free, equal, and non-discriminatory access to acquire, possess, retain, and enjoy all forms of property, including those rights to same as guaranteed under ratified international treaties, and

(b) rights as they relate to employment, interstate commerce, and to closely held business entities.

Defendants have and do injure the Lead Plaintiff and other members of the class by such unequal protection in their systematic pattern of deprivations of rights. Locations and particular details of many of these acts, violations, and injuries are unknown at the time of this complaint and are subject to disclosure through the discovery process.

E. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further

violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	**Facts - Subcount Series**	**Subcount(s)**
600-603	NSEC National Security Pretexting and Entanglements	1-4
604-620	HEXP Illegal Human Experimentation	1-17
621-637	RGTS Individual Rights Violations and Conspiracies	1-17
639-693	RICO Racketeering	1-55
694-710	LTHL Lethality Attempts	1-17

[Intentionally left blank.]

840. CLAIMS FOR RELIEF - COUNT 40

Violations of Constitutional Rights Under the First, Third, Fourth, Fifth, Thirteenth, Fourteenth Amendments

Deprivation of Rights Under Color of Law

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. §§ 1961-1968; 42 U.S.C. §§ 1981, 1982, 1983, 1985, 1986, 1994
Washington:	RCW § 49.060.030(1)
New Jersey:	NJ Stat §§ 10:1-1, 10:5-4, 10:5-12, 10:6-2
New York:	New York Penal L. §§ 105.15, 460.00 through 460.80
California:	NA
Massachusetts:	NA
Arizona:	NA
Texas:	NA
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Paragraphs 839C and 839D are specifically incorporated by reference for their particular relevance to this paragraph. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph. as well as state statutes in all originating locations, many of which are unknown at the time of this Complaint and will be available upon discovery.

B. Defendants have and do plan, conspire, perpetrate and engage in the color of law abuse of the rights of US persons while falsely claiming to be protecting the public and enforcing the law, when they do so for the corrupt purposes of protecting themselves from the proper criminal consequences for their own illegal acts and those of their officers, agents, employees, contractors, or other privileged or favored institutions and individuals. This is color of law abuse, when a fraudulent claim of respect for and equal enforcement of law, of regulation, and of the conditioned privilege of state secrets, known in modern times by the term "national security," or

other regulation, which must comply with the Constitution, with law and ratified international treaties, and with 5 U.S.C. § 301 Departmental Regulation, is made with which defendants, *prima facie* on the evidence herein, do not comply. This color of law abuse has been and is pervasive in the conduct of defendant UNITED STATES in this matter as it illegally (i) continues its development of the prohibited BRMT bioweapon and bioweapon delivery system since at least 1968, (ii) has and does conspire and violate the rights of US persons, (iii) conducts and permit the conduct of racketeering acts against these plaintiffs, (iv) fraudulently conceals these illegal acts and those of its co-conspirators, and (v) willfully sustains official silence and official blindness to even profound *prima facie* evidence of decades long sustained violations of law and regulation, and of obstructions of justice by its own police powers departments and agencies.

C. The primary purposes of this deprivation of rights under color of law have been and are to sustain the conspiracy itself against these plaintiffs for the continued purposes of (i) the development and deployment of the illegal BRMT bioweapon and bioweapon using illegal human subject experimentation on these plaintiffs and to sustain the cover-up of the involvement of defendant UNITED STATES, to (ii) continue the associated-in-fact enterprise and pattern of racketeering acts, and (iii) sustain the political cover-up which initially authorized and has and does sustain the continued illegal conduct so as to avoid and evade political accountability for its authorization, funding, and systematic violations of religious and other constitutional rights by the executive and by senior members of Congress who have had knowledge of this illegal program for decades and persist in political leadership positions. The current Attorney General, GARLAND (DOJ) was a member of the team (then known as Robert Mandich to Lead Plaintiff) who was directly involved in Lead Plaintiff's continued involuntary servitude between at least from 1974-1976 while he attended his undergraduate degree program at Washington State

University, and plausibly as Stuart Bettesworth in 1971-72 at Decatur High School, as related at paragraphs 5, 99m, 211, 320, 419, 600G, 803Q, 833F), which illegal BRMT bioweapon and bioweapon delivery system program was directed by defendant BREYER during that period while posing as fraudulent church elder "Snow" in Kent, WA, then as Jack Sackville-West in Spokane, WA between 1967 and 1980.

D. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	**Facts - Subcount Series**	**Subcount(s)**
600-603	NSEC National Security Pretexting and Entanglements	1-4
604-620	HEXP Illegal Human Experimentation	1-17

621-637	RGTS Individual Rights Violations and Conspiracies	1-17
639-693	RICO Racketeering	1-55
694-710	LTHL Lethality Attempts	1-17

841. CLAIMS FOR RELIEF - COUNT 41

Violations of Constitutional Rights Under the First, Third, Fourth, Fifth, Thirteenth, Fourteenth Amendments

Deprivation of Rights Under Color of Law - Anti-Terrorist Forfeiture Protection

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. § 987, 42 U.S.C. § 1985(1)
Washington:	RCW § 49.060.030(1)
New Jersey:	NJ Stat §§ 2C:20-4, 2C:20-8, 2C:41-1 through 2C:41-6, 10:1-1, 10:5-4, 10:5-12, 10:6-2
New York:	NA
California:	NA
Massachusetts:	NA
Arizona:	NA
Texas:	NA
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph. as well as state statutes in all originating locations, many of which are unknown at the time of this Complaint and will be available upon discovery,

B. Defendants have and do plan, conspire, perpetrate and engage, in particular, defendant UNITED STATES (FBI, ROSENBERG who knew Lead Plaintiff professionally from the early 1980s) created a false terror narrative about Lead Plaintiff in the aftermath of 9/11/2001. This false narrative is now known to have been deliberate public misdirection of accountability which abused the additional powers granted by Congress under the PATRIOT Act and related national security regulations under color of law in creating this false terror narrative.

C. During the Lead Plaintiff's initial forensic reverse engineering in his pre-litigation discovery using FOIA and other public information law requests, this false terror narrative from 2002 turned bogus defendant FBI investigation by ROSENBERG, including the bogus Mossad counter-terror interview ROSENBERG orchestrated in Boston in 2007, was officially acknowledged by defendant NYPD on September 3, 2021, (see Interline Exhibit 17), whereupon it was almost immediately covered up by defendants NYPD and FBI by September 30, 2021 (Interline Exhibit 17-19) as all records were disappeared and substituted by defendant DOJ confirmed disinterest.

D. This false terror narrative was abused in a now failed attempt to fraudulently conceal now clear and convincing evidence that Lead Plaintiff was unwittingly employed as an involuntary servant at Deloitte Seattle from 1979-1986 and other illegal cover companies thereafter for their multiple illegal undercover operational support purposes by defendant UNITED STATES. Some of the coercive commercial cover espionage operations in the lead-up to the 9/11/2001 attack originated among the defendant CIA personnel who used Deloitte Seattle as their commercial cover for those espionage operations in the Middle East (BLAIR, THORPE) while defendant CIA was run by Director William Casey between 1981-1987. Casey was later publicly nicknamed "Wild Bill" for his extremely aggressive use of commercial cover espionage and paramilitary operations, including during the Iran-Contra affair when Deloitte Seattle personnel known to Lead Plaintiff at the time only as fellow consulting team employees (BANNON, BLAIR, THORPE, and separately CORNWELL) most probably played roles in the Middle East and/or in Nicaragua.

E. Deloitte Seattle also employed commercial cover CIA personnel (hosting them to develop their commercial cover legends) who were dispatched into information technology projects at Saudia Airlines (used for defendant CIA espionage during and after that IT project),

soon after the CIA bugging of the headboard in the Saudi King's bedroom on his personal Boeing 747 (later publicly reported in the Seattle-Times newspaper sometime after its discovery by Saudi intelligence). These and other long-running acts against Saudi sovereignty by defendant CIA led in turn to the indirect reprisal attacks in 1993 and 2001 on the World Trade Center and other US targets by third parties known to the Saudis and to defendant CIA.

F. These defendant CIA commercial cover espionage operations, which were run in part out of Deloitte Seattle, are consistent with the pattern of other defendant CIA operations in the Middle East from the 1940s into the early 2000s. Lead Plaintiff gained some personal awareness of these operations when he had unwittingly shared an office in 1978-79 with another CIA asset, a PhD candidate in economics from Iran at defendant WSU during MBA graduate school just as the Shah of Iran, installed during a MI-5/CIA assisted military coup in 1953, abdicated in January 1979.

G. Defendant FBI's WEISSMAN and ROSENBERG were present in Seattle during the 1980s, then illegally embedded at PCC and NutraSource, respectively. Queen Elizabeth II visited Seattle in March 1983 as Lead Plaintiff sold and then worked on a Seattle Westin Hotel consulting project at Deloitte Seattle with commercial cover CIA personnel, FBI, USMS, and UK MI-5 and/or MI-6 at the Seattle Westin during this national security event, where the Queen remained overnight. Defendant WEISSMAN later left the Seattle area for other duties in FBI and DOJ, while defendant ROSENBERG remained illegally embedded at NutraSource to continue those illegal spying and enterprise wrecking programs, and as he directed and participated in defendant FBI's human trafficking of Lead Plaintiff through the illegal defendant CIA and ARMY BRMT bioweapon and bioweapon delivery system program, rights vioaliotns, and associated-in-fact enterprise pattern of racketeering acts into the 2000s, primarily as the CEO of NutraSource before it sale to another wholesaler in Auburn, CA, then while appointed by

defendant DOJ AG Alberto Gonzales as acting US Attorney for the Southern District of Texas and then as Senate confirmed US Attorney for the Eastern District of Virginia.

H. In the aftermath of the 9/11/2001 attack, defendants FBI (ROSENBERG, WEISSMAN, others), ARMY, CIA, and unknown others, recognized a color of law opportunity to (a) conceal the source of the personnel and coercive operations in the Middle East which led to that reprisal attack on 9/11/2001, and (b) to conceal its pattern of illegal conduct using BRMT and racketeering acts, and (c) to evade public accountability and claims against it, which will arise through this complaint and its litigation, for other plaintiffs subjected to comparable patterns of associated-in-fact racketeering acts and rights violations during illegal BRMT development, and from defendants' other corrupt and illegal acts, violations, and injuries to other classes of plaintiffs from illegal spying, surveillance, and *Fourth* Amendment violations described herein.

I. A primary underlying purposes of this entire corrupt sequence from 2002 forward was the fraudulent concealment of defendant CIA's commercial cover espionage activity originating in part from Deloitte Seattle, and of other secret espionage activity, against the Saudi government as a root cause of the indirect 9/11 retaliatory attack, which risk persisted as the 9/11 Commission, which included Slade Gorton, a former senator from Washington state as one of its members, conducted its investigation. Lead Plaintiff had resided in Washington state, with extensive travels elsewhere, except for two years as a young child when he was collaterally trafficked to California with his unwitting family. This Middle Eastern espionage had most probably also included the Lead Plaintiff's own illegal BRMT program orchestrated second spouse, Jeanette (his relationship to Lynne already destroyed by illegal BRMT operations, then orchestrated by defendants BURNS, WATERS, and others). Jeanette most probably had a prior surreptitious history as a trafficked person into the Middle East as an attractive skilled belly

dancer in her 20s and 30s, while she was an enlisted military bisexual who had been deliberately inculpated in national security matters, who was then threatened with criminal military prosecution for her bisexuality while participating in national security matters by defendant ARMY, paragraph 610 and others as referenced therein. Lead Plaintiff was therefore unwittingly a key witness to the entire series of acts which led to the 9/11 indirect retaliatory attack for defendant CIA's meddling.

J. As forensically reverse engineered, before the 9/11 attack occurred, defendant FBI (ROSENBERG) had initiated its plan for the illegal human trafficking of Lead Plaintiff to destroy certain personal medical and financial records. These records provided criminal evidence which inculpated the defendants listed in the subparagraphs below in their long-running pattern of illegal BRMT bioweapon and racketeering crimes. By using the CNA facilities utilization and engineering space planning subcontract with Berger-Abam at the Puget Sound Naval Shipyard industrial area project at paragraph 602 NSEC-3, defendant FBI planned this criminal entrapment attempt with defendant FAUCI, with elements of defendant DOD, and with unknown others, incorporating both national security nuclear secrets and IRS 941 payroll tax trap elements.

K. In the aftermath of 9/11/2001, defendant UNITED STATES then recognized and exploited the additional PATRIOT Act national security powers, and the huge increase in funding it received as a direct result of its interdiction failures, to more aggressively abuse the Lead Plaintiff by applying extreme coercion through extreme forms of illegal BRMT bioweapon and bioweapon delivery system enhanced brain hijackings (forcible takeover) to torture and by simultaneously applying BRMT brain hijacking enhancements to create terrifying psychological operations, all of which combined to drive the Lead Plaintiff to suicide ideation for the purposes of (i) eliminating both a critical witness (Lead Plaintiff, see paragraphs 697-710) and then when

that failed, (ii) by defendants' human trafficking which (a) facilitated the closing of accounts and (b) termination of years-long relationships for medical care and secretly corrupted surgeries, and financial services, and by (c) its knowing refusal to transfer medical records on written request and (d) the passage of time which allowed (e) ordinary course of business destruction of records, which were the direct evidence of the patterns of criminal acts by these defendants against the Lead Plaintiff then available in his personal medical, financial, employment, and other records to be destroyed (the same and comparable obstruction of justice patterns as at Pacific Paper Products in his father's unwitting employment there in 1961-1963 to destroy Cointelpro related medical records evidencing defendant FBI violence against other citizens, and at paragraphs 414, 555, 635, 636, 637).

L. After the security alert delay which strictly restricted access to military facilities imposed after the 9/11 attack, defendants invited Lead Plaintiff to tour the NAVY's PSNS industrial area for the planned engineering study; removed the needed funds to finance the payrolls needed to complete the study from CNA, making that work basically financially impossible to complete; leading to his orchestrated resignation to form Allegent LLC with defendant PRAY, while it invested as co-owner through PRAY in the programmed failure of Allegent, LLC; conspired with CALDWELL (DOJ) to cover up their use of check fraud to destroy Allegent; refused to pay past due compensation to Lead Planitff due from CNA; acted to finally and completely destroy the Lead Plaintiff's orchestrated and coerced marriage to Jeanette in 2004-2005, destroyed career other options from 2003 forward; and attempted the complete theft of past due CNA compensation. Taken together, these acts deprived Lead Plaintiff of all cash flow, all further employment, and then of all liquid assets, which forced the liquidation of all other personal and real property in 2005 to homelessness, which defendants accomplished by December 2005. With the assistance of SUMMERS, defendant FBI then human trafficked Lead

Plaintiff to Boston and homelessness in late December 2005 for 21 months, before his further trafficking to fake employment in ESTABLISH in August 2007, another cover company run once again by defendant ROSENBERG, whose prior male pattern baldness had been concealed while he ran NutraSource in Seattle and, in any case, was not expected by the Lead Plaintiff to appear on the east coast under a different name as Lead Plaintiff's new direct supervisor and employer at defendant ESTABLISH.

M. These national security pretexting and related color of law abuses, acts, violations, and injuries to Lead Plaintiff are explained in detail at paragraphs 600-603 NSEC-1 through NSEC-4 and are representative of such acts, violations, and injuries to this class of plaintiffs.

N. This illegal human trafficking of Lead Plaintiff further benefitted these defendants and their corrupt associated-in-fact enterprise by concealing and arranging the destruction of medical records (requested but never delivered to Lead Plaintiff from his Kirkland, WA primary care physician of many years in 2007) from the sequence of illegal BRMT programmed illnesses, allergies, hospitalizations, and surgeries, and of financial and other records evidence of racketeering acts, which could then have been used to positively establish criminal liability for both (a) the illegal human experiments by these defendants during illegal BRMT development and deployments, and (b) the racketeering acts used to sustain involuntary servitude and other illegal acts. All this now destroyed evidence would have inculpated the below listed defendants and others unknown, and operated in their corrupt interests. The destruction of Lead Plaintiff's records from his residence in Washington state directly benefitted defendants including, without limitation, UNITED STATES, ARMY, CIA, DOJ, FBI, USMS, WEISSMAN, ROSENBERG, MELBER, RUBIN, Alexander VINDMAN, BREYER, GARLAND, and other defendants, who operated in this associated-in-fact enterprise pattern of racketeering acts in the illegal and criminal acts from inception to 2005, which incorporated these defendants' systematic criminal

abuses of the constitutional rights of Lead Plaintiff and of certain other plaintiffs of this class through their associated-in-fact enterprise pattern of racketeering acts.

O. Defendants UNITED STATES, most particularly including defendants DOJ, FBI, USMS, CIA, and individual defendants who are current or former government officials, among others unknown have since 1979 through the present, abused the Lead Plaintiff through human trafficking, other racketeering crimes, and illegal BRMT operation to the point of torture and multiple suicide ideations, which have been and are combined with street level harassment by police powers personnel and misguided members of the public. This pattern has and does continue from 1968 over decades, in the 2018 human trafficking of Lead Plaintiff to his current residence in a mixed use complex 550 feet from a key locus in the Senator Menedez public corruption investigation, paragraph 599D(i)(h), and continues at present through the programmed health collapse at paragraph 710, and by other now recognized means.

P. Defendant UNITED STATES, its departments and agencies, and certain of its co-conspirator defendants, have and do routinely and repeatedly elect to directly entangle Lead Plaintiff in its national security probes and investigations, and has and does purposefully engage in these acts, violations, and injuries under color of law to perpetuate its cover-up of its cross-department, cross-agency, and cross jurisdictional organization of and perpetuated participation in, the associated-in-fact enterprise pattern of racketeering acts, rights violations, and the illegal BRMT bioweapon and bioweapon system development, test, and deployment cycle over the past more than 56 years.

Q. The false terror narrative and pretext which began in 2002, and which was swiftly covered up after its confirmation in September 2021 by defendant NYPD (Interline Exhibits 17-19), was defendant UNITED STATES' (including ROSENBERG, FBI, and other defendants) purposeful, deliberate, and malicious color of law abuse of the state secret privilege, and its

knowing and willful construction of the fraudulent terror pretext, resulted in (a) the complete loss of property and (b) the knowing and willful destruction of evidence of crimes and valid legal claims which had been and were fraudulently concealed.

R. The Lead Plaintiff, and other plaintiffs similarly situated, have and do suffer such losses of property rights without forfeiture procedure at the hands of defendant UNITED STATES beginning in 1983 with thousands of dollars forfeited to a fraudulent programmed to fail enterprise in the now known as fraudulent Sheldon-Lee partnership with defendant CIA's THORPE (paragraphs 428, 650D RICO-12), even before the 1986 initial adoption of 18 U.S.C. §§ 981-986 absent the March 2006 § 987 anti-terrorist forfeiture protection. All these forfeitures were surreptitious in origin and without any administrative process whatsoever, but did incorporate in some direct or indirect form which was unknown to Lead Plaintiff until understood through the forensic reverse engineering process he began in mid-2021, the continued illegal operation of the prohibited BRMT bioweapon and bioweapon delivery system and the associated-in-fact enterprise pattern of racketeering acts, and of rights violations, by defendant UNITED STATES, it departments and agencies, and its co-conspirator defendants, which are well documented throughout this complaint. Losses sustained both before and since adoption of 18 U.S.C. § 987 from wrongful narratives constructed by defendants have and do include the loss of property and appreciation, including all rights which affect interstate commerce, forcibly forfeited by the actions and failures to act of defendant UNITED STATES and its co-conspirators including, without limitation, press, media, entertainment, and other private defendants in this conspiracy.

S. The complete and total forced forfeiture of rights and property which resulted from this series of comprehensive frauds has included, without limitation, the forced complete forfeiture of all property by Lead Plaintiff through loss of income to suicide ideation to

homelessness, all meticulously planned and systematically perpetrated by defendant UNITED STATES and the related institutional and individual defendants, whether currently known or unknown, for defendants' own corrupt purposes and benefit, without absolutely no due process of any kind, much less a properly contestable civil forfeiture process under 18 U.S.C. §§ 981-986, destroying all notions of unalienable rights in the face of the force of corrupt government officials and the operations they illegally ordered and conducted for their own institutional and individual purposes and benefit with no regard for rights or law.

T. Congress added 18 U.S.C. § 987 on March 9, 2006 to protect the personal, financial, real, intangible and other property and property rights of persons wrongfully accused of terrorism from the forced forfeiture of their property. This law was coincidentally adopted soon after Lead Plaintiff had already been forcibly coerced into homelessness in December 2005 from Kirkland, WA and, fearing at the time for other family members, was again illegally human trafficked, this time while homeless to Boston, MA, by defendant UNITED STATES (FBI, CIA, USMS, ROSENBERG (FBI), with the support of SUMMERS, then Harvard University President, in December 2005, to further homelessness in Boston, MA, where Lead Plainitff ran out of money in Spring 2006. Lead Plaintiff moved from a hotel to Pine Steet Inn in about April 2006, then later to the Dorchester Heights facility used by Pine Street Inn, Boston, MA, which housed Lead Plaintiff and his federally assigned BRMT illegal bioweapon and bioweapon delivery system related security team, where he remained in limbo during fruitless job hunting (electronically hacked for continued control by defendant UNITED STATES) until his next human trafficking in August 2007 to ESTABLISH, Fort Lee, NJ, under the direction of defendant ROSENBERG, after a Boston-area Mossad counter-terrorism behavioral "job" interview orchestrated as a pretext by defendant FBI (ROSENBERG), as defendants FBI and CIA perpetuated their false terror narrative used to misdirect other police powers toward Lead Plaintiff and way from the

reality that 9/11/2001 was in part retaliation by groups in the Middle East for activities against sovereignty by defendant CIA in that region, and as they perpetuated and expanded their associated-in-fact racketeering enterprise directed specifically at Lead Plaintiff from his age 12 in 1968, to include various police powers operations in the greater New York City area, among others.

U. After the adoption of 18 U.S.C. § 987 in March 2006, the Lead Plaintiff has also repeatedly suffered further surreptitious property forfeitures including, without limitation, losses of valuable physical and electronic evidence (much or all most probably still remaining in the hands of defendants FBI, ROSENBERG) supporting this complaint, losses of computers, printers, personal property, furnishings, furniture, tools, equipment, intangible work product, and other items, in Boston, MA, Cliffside Park, NJ, Ramsey, NJ, and Edgewater, NJ, between March 2006 and the present. These forced orchestrated surreptitiously organized and executed forfeitures without notice and without process have recurred to Lead Plaintiff (i) while residing in the Boston, MA homeless shelter in mid-2006 losing valuable eyeglasses with no funds available to replace them, 650,000 air miles lost to forfeiture, computer files which support his claims against these defendants lost to rough handling by defendants, and lost to suppression of evidence (personal intangible property) not yet returned by defendant FBI, (ii) while residing in Cliffside Park, NJ from August 2008 to October 2010, (iii) by his forcible removal to a behavioral health unit for coercion into dismissing under duress a federal court complaint from October 2010 through March 2011, and (iv) by his human trafficking by defendant FBI and other co-conspirators from his assigned apartment in Ramsey, NJ, where he lived from 2011-2018, soon after he made substantial improvements to its physical infrastructure, furnishings, and fixtures. These involuntary forfeitures have and do include valuable documentary evidence supporting constitutional claims which have been lost to obstructions of justice by defendant

UNITED STATES, as well as forfeited, tampered, and destroyed personal property lost to defendant UNITED STATES by operation of illegal tampering, human trafficking, and electronic vandalism, all as orchestrated by defendant UNITED STATES without due process and without administrative process. amounts and losses to be proven at trial.

V. The BRMT bioweapon brain hijacking program is not defensible either as a "state secret" nor in the interests of "national security," as it systematically (i) violates the Article II limits on federal executive powers established in the Constitution, (ii) vastly exceeds the Article I authorities of Congress to constitutionally approve or appropriate to support or sustain such an illegal program in violation of a ratified treaty and of individual rights under our Constitution, (iii) can and does directly injure US persons and their rights and (iv) even their physical well-being to and including torturous injury and death without due process, and (v) systematically violates their human, Constitutional, legal, and civil rights, including (vi) those guaranteed to all humans under ratified international treaties having force of law in the United States of America, while (vii) posing a direct, immediate, and continuing threat to any and all US persons. Yet this illegal BRMT bioweapon and bioweapon delivery system (effectively an actual weapon of mass destruction which can be individually targeted, rather than the imaginary WMD they were tagging Saddam Hussein with prior to the invasion of Iraq) which is internationally prohibited by ratified treaty, was and still is used to internally justify the persistence of a functionally illegal and unconstitutional secret police state within a state, wherein the seizure and forfeiture of private property was and is justified. Our Constitution says otherwise:

> "The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no Warrants shall issue, but upon probable cause, supported by Oath or affirmation, and particularly describing the place to be searched, and the persons or things to be seized."

W. Defendant UNITED STATES (FBI, CIA, USMS, ARMY) simply chose not to recognize the Constitution in their forcible surreptitious seizures and forcible forfeitures of these unalienable rights, including to all form of property. They have and do deem that by using surreptitious means they can excise these plaintiffs of their property rights without due process, and not be subject to our Constitution or to federal law. This conduct, never legal, occurred most aggressively in 2005 at the very moment when Congress enacted, and specifically intended to protect, all property rights of those wrongfully accused and subjected to forfeiture by any and all means, and wherein Congress specified the broadest possible application of these protections as it adopted 18 U.S.C. § 987(b):

> "In considering a claim filed under this section, a court may admit evidence that is otherwise inadmissible under the Federal Rules of Evidence, if the court determines that the evidence is reliable, and that compliance with the Federal Rules of Evidence may jeopardize the national security interests of the United States."

X. Protecting property rights was the paramount intent of Congress in this specific legislation. Yet somehow, separation of powers meant to the executive branch, that Congressional intent could be ignored by the executive branch, that the Constitution itself could be ignored by the executive branch, and that it could seize by surreptitious means whatever property it chose from any US person it selected for its property rights seizures. Defendant UNITED STATES itself created the false terror narrative it then used to serve its own corrupt purposes and to fraudulently conceal the entire pattern of prior conduct against rights and property from inception.

Y. By 2005, the unwitting Lead Plaintiff had already lived with defendant USMS, FBI, DOJ personnel in college (PAGE, GARLAND, and others), stayed with and shared "family" life with illegal BRMT bioweapon and bioweapon delivery system program manager (future Supreme Court Justice) defendant BREYER in Spokane, WA, officed with CIA international

assets while in MBA graduate school (Hamid Bahari-Kashani, now deceased), married the former wife of a police powers official (Lynne, former wife of Task Force and Precinct Commander Boyle, King County Sheriff's Department), raised that police powers official's children as his teen stepchildren, was an uncle to children of personnel directly engaged in national security matters (RUBIN, VINDMAN), and held family gatherings, and other social events with, and worked directly with, the members of various national security teams on military, defense, and intelligence matters, police powers investigations (Deloitte Seattle, PCC, LazerSoft, Alliance, PAN, Pacific Pipeline, CNA, later ESTABLISH), and with deep cover commercial espionage assets of CIA, and FBI, ARMY, USMS and other federal police powers personnel while they engaged in these activities in both domestic US and international operations, and had lived through a fraudulently orchestrated marriage formed in violation of US law and of the third Amendment by defendants CIA, ARMY, BURNS, WATERS, and other defendants, and through fraudulent employment and other depravities described herein.

Z. Lead Plaintiff lived with defendant UNITED STATES personnel, sharing the same dormitory and apartment bedrooms and showers, babysat and played with their kids from at least college age onward, bought gifts, threw and attendee adult and childrens' parties, spent holidays, mooched meals in college, and cooked and cleaned for them as family, roommate, and friend. There neither was, nor is, any possibility that defendant UNITED STATES did not clearly understand every single aspect of Lead Plaintiff's life and character from at least age 12, arguably even from his initial collateral trafficking at age 5 to California for the covert defendant FBI Cointelpro evidence destruction program which trafficked his unwitting father and family to California for two years.

AA. Any argument by defendant UNITED STATES, or any other party including press, that the Lead Plaintiff has ever presented any national security or terror threat was always utterly

absurd on its face, and was based solely upon and directly intended to serve, defendant UNITED STATES' (CIA, FBI, ROSENBERG, FAUCI, and unknown others) specific corrupt purpose of erecting and sustaining a false and specifically misdirected propaganda narrative intended to endanger the Lead Plaintiff. This defendant UNITED STATES and its co-conspirators' fraudulently constructed narrative actually best fits these defendants' own pattern of conduct in their prior covert actions when they meddled directly in other nations' leadership ands sovereignty, and engaged in covert acts of war against national sovereignty which generated the 9/11/2011 indirect reprisal attack on the United States, and in these defendants' own conspiracies, acts, violations, and injuries, which they have and do perpetrate against the Lead Plaintiff and his interests including, without limitation, his property interests, both tangible and intangible.

AB. All available evidence, including defendant UNITED STATES' continuing abuses of the illegal BRMT bioweapon and bioweapon delivery system to literally manipulate the words coming from the Lead Plaintiff's mouth, point directly and immediately at defendant UNITED STATES and its co-conspirators as the specific source of this threat. So, there never was nor is any legal basis for any argument by defendants that there is any foundation in law for any forced forfeiture of property by Lead Plaintiff, nor have they ever indicated, much less undertaken, any proceeding to even assert any such forfeiture claim, which is required under 18 U.S.C. § 983. They knew there was no legal basis for their planned actions, so they undertook these acts surreptitiously instead. The result was the same, forfeitures but in the complete absence of due process and their utter contempt of the legal process specified by Congress and under our Constitution. Defendants illegally conspired, schemed, and acted to effect this scheme and conspiracy extra-legally and with absolutely no authority of any kind whatsoever, upon which this Court can and must act and order to reverse, and to which and for which restoration of rights,

Congress has granted this Court the broadest conceivable legal authority, both to restore to equity the Lead Plaintiff and to order defendants to immediately disgorge any and all property, to account for each and every property item and interest it forced into forfeiture, and to immediately undertake to identify, reconstruct, and restore all property, to each and every member of this class of injured plaintiffs, from the first day of the illegal BRMT program initiation in the 1970s, so these plaintiffs may finally receive justice under our Constitution and laws.

AC. Neither the federal executive, acting through defendant DOJ Department of Justice, nor Congress has previously taken up or pursued, much less implemented, any such action to restore equity, as demonstrated by their complete neglect of the innocent victims of FBI's felonious Cointelpro program and of CIA's criminal MKUltra program, for either those deceased or for those who survived, in the aftermath of those programs. The remedies for these extreme excursions from Constitutional limits by these wild federal excesses in exercise of discretion against property rights, are thereby placed in the hands of our Article III Courts as their clear constitutional responsibility through this clearly expressed Congressional intent to act against such egregious injuries and to restore equity. Congress acted aggressively to protect persons and their property and to restore equity and property for wrongfully inculpated persons in 18 U.S.C. § 987. This court has the most expansive possible means to restore property and equity to these victims of the illegal actions by defendant UNITED STATES against the property, rights, and religion of these plaintiffs.

AD. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further

violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	**Facts - Subcount Series**	**Subcount(s)**
602, 603	NSEC National Security Pretexting and Entanglements	3, 4
612	HEXP Illegal Human Experimentation	9
625	RGTS Individual Rights Violations and Conspiracies	5
639, 641-646, 654-680, 682, 684-693	RICO Racketeering	1, 3-8, 16-42, 44, 46-55
	LTHL Lethality Attempts	

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842. CLAIMS FOR RELIEF - COUNT 42

Violations of Constitutional Rights Under the First, Third, Fourth, Fifth, Thirteenth, Fourteenth Amendments

Deprivation of Rights Under Color of Law - Searches and Warrants

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	42 U.S.C. §§ 1981, 1985
Washington:	RCW § 49.60.030(1)
New Jersey:	NJ Stat §§ 10:1-1, 10:5-4, 10:5-12, 10:6-2
New York:	NA
California:	NA
Massachusetts:	NA
Arizona:	NA
Texas:	NA
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Paragraphs 839C and 839D are specifically incorporated by reference for their particular relevance to this paragraph. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph. as well as state statutes in all originating locations, many of which are unknown at the time of this Complaint and will be available upon discovery,

B. Defendants have and do plan, conspire, perpetrate and engage in violations of the *Fourth* Amendment which guarantees the right to be free of searches and seizures absent a lawfully obtained warrant. Among other acts, injuries, and violations at the final subparagraph in this paragraph, both within and without the territory of the United States, defendant UNITED STATES and co-conspirator defendants have and do act in systematic fraudulently concealed violations of constitutional rights by the means described, without limitation, in paragraphs 839C and 839D.

C. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	Facts - Subcount Series	Subcount(s)
600-603	NSEC National Security Pretexting and Entanglements	1-4
604-620	HEXP Illegal Human Experimentation	1-17
621-637	RGTS Individual Rights Violations and Conspiracies	1-17
639-693	RICO Racketeering	1-55
694-710	LTHL Lethality Attempts	1-17

843. CLAIMS FOR RELIEF - COUNT 43

Violations of Constitutional Rights Under the First, Fourth, Fifth, Thirteenth, Fourteenth Amendments

Deprivation of Rights Under Color of Law - Searches Without Warrant

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	42 U.S.C. §§ 1981, 1985
Washington:	RCW § 49.060.030(1)
New Jersey:	NJ Stat § 10:6-2
New York:	NA
California:	NA
Massachusetts:	NA
Arizona:	NA
Texas:	NA
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Paragraphs 839C and 839D are specifically incorporated by reference for their particular relevance to this paragraph. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph. as well as state statutes in all originating locations, many of which are unknown at the time of this Complaint and will be available upon discovery,

B. Defendants have and do plan, conspire, perpetrate and engage in violations of the Fourth Amendment guarantees the right to be free of searches and seizures absent a lawfully obtained warrant. Among other acts, injuries, and violations at the final subparagraph in this paragraph, both within and without the territory of the United States, defendant UNITED STATES and co-conspirator defendants have and do act in systematic fraudulently concealed violations of constitutional rights, initially subjecting and then sustaining illegal searches by the means described, without limitation, in paragraphs 839C and 839D.

C. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant

UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	**Facts - Subcount Series**	**Subcount(s)**
600-603	NSEC National Security Pretexting and Entanglements	1-4
604-620	HEXP Illegal Human Experimentation	1-17
621-637	RGTS Individual Rights Violations and Conspiracies	1-17
639-693	RICO Racketeering	1-55
694-710	LTHL Lethality Attempts	1-17

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844. CLAIMS FOR RELIEF - COUNT 44

Violations of Constitutional Rights Under the First, Fourth, Fifth, Thirteenth, Fourteenth Amendments

Fraud - False Information and Hoaxes

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. §§ 1038; 42 USC 1981, 1985
Washington:	RCW § 49.60.030(1)
New Jersey:	NJ Stat §§ 2C:14-9, 10:6-2
New York:	New York Penal L. § 190.25
California:	NA
Massachusetts:	Mass Gen L ch 269 § 14a
Arizona:	NA
Texas:	NA
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph. as well as state statutes in all originating locations, many of which are unknown at the time of this Complaint and will be available upon discovery,

B. Defendants have and do plan, conspire, perpetrate and engage in furtherance of illegal BRMT bioweapon and bioweapon delivery system development, testing, and deployment, illegal human subject biomedical and psychological experimentation and terrorization, torture, and theft, among other acts, injuries, and violations at the final subparagraph in this paragraph, both within and without the territory of the United States, defendant UNITED STATES has at all times since 1968 acted in knowing and willful violation of 18 U.S.C. §§ 1038, 1542, 1543, 1544, to injure Lead Plaintiff and all members of this class of plaintiffs by, promulgating and disseminating false information and hoaxes regarding the alleged conduct of Lead Plaintiff and others similarly situated to directly endanger these plaintiffs and to persuade others not to employ or associate with them when such employment or association would not suit the corrupt

and criminal purposes of defendant UNITED STATES in perpetuating their peonage, involuntary servitude, forced labor, and other deliberate discriminations against unalienable rights in furtherance of defendant UNITED STATES and its co-conspirators' series of schemes, conspiracies, frauds, thefts, and deprivations to these plaintiffs, their families, personal relations and relationships, their careers, reputations, fortunes, and business interests, including closely held business entities, among other acts, injuries, and violations at the final subparagraph in this paragraph, both within and without the territory of the United States. Statutory civil recovery for 42 U.S.C. §§ 1981, 1985 equal protection and conspiracy violations under 42 U.S.C. § 1983 action for conspiracy against rights under color of law is permitted against defendants UNITED STATES, and including, without limitation, individual defendants ROSENBERG, BURNS, MELBER, RUBIN, VINDMAN, and others not presently known for their 18 U.S.C. § 1038 attempts to create hoaxes, fictional legends, and entrapments as follows:

(i) Chapter 2—Aircraft And Motor Vehicles (18 U.S.C. §§ 31 – 40a)

§ 32. Destruction of aircraft or aircraft facilities - several illegal BRMT bioweapon brain hijacking prompts toward attempting in-flight door operations as Lead Plaintiff was pursuing fraudulent sales leads during the 2002-2005 cash flow and income starve out (paragraph 673), wherein no action was taken by Lead Plaintiff to complete these door opening mental prompts by the illegal BRMT bioweapon and bioweapon delivery system,

§ 37. Violence at international airports – an FBI entrapment attempt at paragraph 693A-C, wherein defendant FBI and/or its co-conspirators attempted to create a violent outburst after a storm-truncated flight delay at Kennedy Airport in New York City sleep period remain overnight resulting from a missed connection during his transit of Seattle-Tacoma International Airport, by their substitution of

an undercover officer who refused to deliver a breakfast check to Lead Plaintiff as he needed to depart the concourse restaurant for his early morning flight to visit a ranch property listed for sale in Lake County, Oregon during one of his many attempts at private business affecting interstate commerce.

(ii) Chapter 10—Biological Weapons (18 U.S.C. §§ 175 – 178) - as actually used by UNITED STATES against Lead Plaintiff through its illegal deployment of the BRMT bioweapon and bioweapon delivery system against Lead Plaintiff, but created, promulgated, and perpetuated as a legend and false public narrative against him by its surreptitious creation and publication of live video, and in its exploitations in public venues of Lead Plaintiff which specifically includes, without limitation, on August 26, 2023 while Lead Plaintiff was enroute to and from Washington, DC for a MLK memorial civil rights rally. Defendant co-conspirators PAPD, DC Metro, and NYPD (LPEE page 11931), each conducted EDP training session drills while he transited locations in their jurisdictions, which drills had been developed, promulgated, and perpetuated and were intended and used by defendant UNITED STATES and its co-conspirators as persistent misdirection, to create and perpetuate their hoax and wrongfully convey a false public image of Lead Plaintiff as an emotionally disturbed person, paragraphs 320b, e, 615D, 463-465.

(iii) Chapter 113b—Terrorism (18 U.S.C. §§ 2331 – 2339d) as actually perpetrated by UNITED STATES and/or its co-conspirators against Lead Plaintiff and other innocent persons but promulgated against as misdirection to promote and perpetuate a fictional legend regarding Lead Plaintiff, paragraphs 11, 451, 516-519, 521, 603T-U, 604F.

(iv) 42 U.S.C. Division A - Atomic Energy Subchapter XVII - Enforcement § 2284(b)

a. “Unauthorized use or tampering with facilities, etc. Any person who knowingly causes an interruption of normal operation of any such facility through the unauthorized use of or tampering with the machinery, components, or controls of any such facility, or attempts or conspires to do such an act…”

b. as actually perpetrated by UNITED STATES and its co-conspirators against Lead Plaintiff, and promulgated and promoted by specific misdirection to create, promote, and perpetuate a fictional legend regarding Lead Plaintiff, paragraph 602 NSEC-3.

C. Among other falsely created legends in service of defendant UNITED STATES and its co-conspirators have been unfounded allegations spread by and in service of myths about sexual deviancy, pedophilia, terrorism, murder, misogyny, and other heinous acts and allegations regarding Lead Plaintiff who had prior to the decision to raise these allegations in support of potential lethal threats from others through this program of misdirection, spent hundreds of thousands of hours unwittingly living with and working with these same defendants for more than three decades. Defendants (UNITED STATES, ROSENBERG, NYPD, NJTPD, PAPD, BERGEN SHERIFF, NJSP, unknown others) conspired and arranged (a) a bogusly pretexted Mossad interview in greater Boston (paragraphs 464, 603B), (b) the female officer honey traps run in the NYC region by various police powers (paragraph 504, 505), (c) the NYPD/FBI fraudulent terror investigation (paragraphs 464, 519, 555, 560, Interline Exhibits 17-18, 603B, F, G, L, 634C, 802B, 841) cover-up in September 2021 are illustrative of the effort and energy which defendant UNITED STATES (FBI, USMS, CIA) put into this effort from 2002 forward, (d) the use of police powers personnel children during volunteer work with a falsified police powers variant of New York Cares (paragraph 526) and (e) the now known to be publicly and permanently internet available sex scenes from 2008 with MODDERMAN (paragraph 611

orchestrated to Lead Plaintiff as a doting mother of three children by defendant FBI's ROSENBERG using MATCH GROUP website Match.com, actually adult film actor and later Trump hush money recipient Stephanie Clifford related to their 2006 relationship, all then unknown to Lead Plaintiff but well known to defendants FBI, CIA, ROSENBERG, and unknown others), and with defendant GIA (paragraph 613 HEXP-10) were all examples of the wide variety of the false information and hoaxes used in this myth creation and public propaganda by defendants DOJ, FBI (ROSENBERG, WEISSMAN) and CIA (BURNS).

D. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	Facts - Subcount Series	Subcount(s)
600-603	NSEC National Security Pretexting and Entanglements	1-4
607, 608,611-615, 619	HEXP Illegal Human Experimentation	4, 5, 8-12, 16
625	RGTS Individual Rights Violations and Conspiracies	5
	RICO Racketeering	
	LTHL Lethality Attempts	

845. CLAIMS FOR RELIEF - COUNT 45

Violations of Constitutional Rights Under the First, Third, Fourth, Fifth, Eighth, Ninth, Thirteenth, Fourteenth Amendments

Neglect To Protect - Failure to Protect

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. §§ 1961-1968; 42 U.S.C. §§ 1981, 1982, 1983, 1985, 1986, 1994
Washington:	RCW §§ 9A.80.010, 42.20.100
New Jersey:	NJ Stat §§ 10:6-2, 59:2-2, 59:3-14
New York:	New York Penal L. §§ 100.00, 100.10, 105.15, 115.00, 115.05, 460.00 through 460.80
California:	NA
Massachusetts:	NA
Arizona:	AZ Rev Stat § 11-441
Texas:	NA
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph. as well as state statutes in all originating locations, many of which are unknown at the time of this Complaint and will be available upon discovery. Arguments and allegations in paragraph 805 are specifically incorporated herein by reference.

B. Defendants have and do plan, conspire, perpetrate and engage, at all times since approximately 1968, in direct and explicit acts, violations, and injuries against the unwitting Lead Plaintiff and even prior to the time acted against others in this class of plaintiffs including,

without limitation, his now deceased father and other extended family members, who did or do practice the Quaker-based religion of Lead Plaintiff's family from at least the time of the Civil War (paragraph 409). Defendants have and do violate 18 U.S.C. §§ 1961-1968 inclusive of all criminal and civil violations recited herein and defined at 18 U.S.C. § 1961, 42 U.S.C. §§ 1981, 1982, 1983, 1985, 1986, 1994, and state statutes in an unknown number of states, in a knowing and willfully negligent manner to fail to protect and prevent acts, violations, and injuries to constitutional and statutory rights of this class of plaintiffs, and in fact, acted jointly and severally to align their various teams, details, and organizations to injure Lead Plaintiff and other members of this class of plaintiffs by systematically failing to comply with their sworn oath to preserve, protect, and defend the Constitution, their fellow citizens themselves, the rights and properties of those fellow citizens, and the personal relationships, homes, and families of those fellow citizens, of this entire class of similarly situated plaintiffs.

C. Under 42 U.S.C. § 1986, inculpated defendants are defined as follows (emphasis added):

> "Every person who, having knowledge that any of the wrongs conspired to be done, and mentioned in section 1985 of this title, are about to be committed, and having power to prevent or aid in preventing the commission of the same, neglects or refuses so to do, if such wrongful act be committed, shall be liable to the party injured, or his legal representatives, for all damages caused by such wrongful act, which such person by reasonable diligence could have prevented; and such damages may be recovered in an action on the case; and any number of persons guilty of such wrongful neglect or refusal may be joined as defendants in the action;"

Under Congressional intent, inclusive of fraudulently concealed 42 U.S.C. § 1985 conspiracies against rights at 28 U.S.C. § 2679(b)(2):

> "(2)Paragraph (1) does not extend or apply to a civil action against an employee of the Government—
> (A) which is brought for a violation of the Constitution of the United States, or
> (B) which is brought for a violation of a statute of the United States under which such action against an individual is otherwise authorized."

D. This pattern of neglect to prevent has been and is widespread and deeply rooted, durable as to time and place for more than 56 years in Lead Plaintiff's direct personal experience and most probably longer as experienced by other members of this class including members of his extended family, and is documented herein at paragraphs 99e-h, 99j-m, 219, 298, 571, 580-584, 628 RGTS-8, 816, 817, Interline Exhibits 17-19. This purposeful and willful negligence actively furthered these defendants' series of schemes, conspiracies, frauds, thefts, and deprivations to these plaintiffs, their families, personal relations and relationships, their careers, reputations, fortunes, and business interests, including closely held business entities among other acts, injuries, and violations at the final subparagraph in this paragraph, both within and without the territory of the United States.

E. Constitutional rights violations which these defendants neglected to prevent in their acts, violations, and injuries of the Lead Plaintiff include the specific known violations referenced in this paragraph and those referenced at other paragraphs in this complaint. Among other acts in conspiracy with state and local governments and their police powers, the following individual defendants, and all the persons whose cover identities are included at paragraph 105 table, 226 table, 541 table, and in the compendium at LPEE pages 934-1075, engaged in conspiracies, attempts and acts to conduct:

(i) BREYER, KATYAL, GARLAND, WEISSMAN, ROSENBERG, BURNS, STONE, RUBIN, MELBER, FAUCI, CALDWELL, Alexander VINDMAN, Yvgeney VINDMAN, directly, knowingly, willfully, and sustainably participated in an on-going program of involuntary servitude (*Thirteenth* Amendment rights violations) together with state and local officials who cooperated in and accommodated their specific requests for discriminatory conduct directed at Lead Plaintiff using their state and local police and

administrative powers, including without limitation, (i) Federal Way School District, FWSD, which created Decatur High School three years before constructing the high school campus, (ii) Green River Community College which assigned instructors and arranged for specific encounters with federal and defendant WASH and its department and agency employees posing as students for specific federal purposes, (iii) defendant WSU (Washington State University) which made specific residential housing arrangements and reassignments for the purposes of arranging the use of federal and defendant WASH state employees to accompany and befriend the Lead Plaintiff, and assisted to directly associate and entangle him with defendant CIA assets and personnel and with defendant DOJ, FBI, USMS personnel while in undergraduate and graduate school, and (iv) with the Whitman County Sheriff's Department and (v) defendant KCSD (King County Sheriff's Department) for embedded resources, which were used to manage and surround him from 1970 until 2005, when the Lead Plaintiff was human trafficked from the Seattle area by defendants FBI, CIA, FAUCI, and ROSENBERG, all acting for (a) the illegal purposes of perpetrating and perpetuating illegal human experimentation on an unwitting human medical subject to support the development of the illegal bioweapon and bioweapon delivery system in violation of 18 U.S.C. § 175, and (b) while engaging in other associated-in-fact enterprise patterns of racketeering acts, violations, and injuries, by (c) knowingly and fraudulently posing as friends, relatives, employers, subordinates, attorneys, medical doctors, and (d) in other fraudulent and fraudulently concealed relationships with the Lead Plaintiff, all to manage his affairs, relationships, and employment in their systematic violations of constitutional rights and associated-in-fact pattern of racketeering acts.

(ii) BREYER, GARLAND, CUNHA, BURNS, and unknown other US government employees with the identified cover names of defendant UNITED STATES (DOJ, FBI, CIA, ARMY) acted in conspiracy with defendant WSU (Washington State University), Pullman WA, a state chartered and funded land grant university with its own police powers operation, and with state, county, and city police powers to orchestrate student housing and teaching assistant office assignments and specified assignment of federal personnel surrounding Lead Plaintiff during Lead Plaintiff's undergraduate and graduate programs, with all as described at paragraphs 4(i), 5, 21(i), 48, 99d, 99m, 111, 211, 415, 419, 491-492, 541, 599(i)(a), 600G, 608C, 833F, 840C, all of whom participated as described at (i) above in the illegal BRMT bioweapon and bioweapon development program, and in conspiracy with state and local officials identified at (i) above.

(iii) WEISSMAN, an agent of defendant FBI, and through other unknown U.S. government employees with the identified cover names included at paragraphs 105 table, 541 table, LPEE pages 934-1075 acted in conspiracy with state and local police powers in Washington state (State Patrol, King County Sheriff) as described at paragraphs 51, 99j, 105 table, 112, 212, 303, 320A, 417-418, 422, 425-436, 436, 449, 497-498, 541, table, 557-562, 600, 602, 609, 626, 694, 820, 822, 831, 836, 841.

(iv) ROSENBERG, an agent of defendant FBI, having human trafficked Lead Plaintiff from Washington state through Boston, MA with the assistance of SUMMERS, and Governors Mitt Romney and Deval Patrick as Massachusetts governors during that period, who allocated state and local resources to this purpose and acted in conspiracy with defendants CIA, DOJ and its agencies, then conspired through the regional Joint Terror Task Forces in New Jersey and New York City with defendants NYPD, PAPD, NJTPD, NJSP to conduct joint and several targeted operations against the Lead Plaintiff

operations, beginning with the human trafficking to fraudulent employment of Lead Plaintiff at Establish, Fort Lee, NJ in August 2007. These defendants, acting through defendant ROSENBERG and unknown others, conspired with MI-5, MI-6, and London Metropolitan Police to conduct a week-long visit in September 2007 for operational pretexting and entanglement into illegal searches and fraudulent employment at ESTABLISH, Fort Lee, NJ, having previously acted in other conspiracies with state and local police powers in Washington state (WASH, KCSD, unknown others), all as described at paragraphs 21(iv), 38, 51, 99g, 105 table, 107, 112, 121, 165, 166, 213, 223, 320c, 320f, 320end, 416, 431-436, 440, 452, 454, 459, 462-472, 497-498, 516-519, 536, 541 table, 555-562, 599H, 600P, 602, 603, 606, 609, 611, 623, 625, 626, 632, 634, 641, 650, 656, 673, 691, 694, 801, 820, 831, 836, 841, 844.

(v) MELBER, RUBIN, as agents of defendant FBI, acted as fraudulent extended family members of Jeanette, Lead Plaintiff's fraudulently orchestrated second spouse, in conspiracies which also incorporated ROSENBERG, BURNS, and FAUCI in undercover embedded enterprise roles as program managers and executives of defendant UNITED STATES (DOJ, CIA), with defendants' state and local police powers in Washington state (WASH, KCSD, unknown others), British Columbia, and the United Kingdom, all as described at paragraphs 99f, 99h, 216, 218, 303, 320f, 422, 443, 500, 501, 562, 600P, 603B, 604B, 606L-O, 610G, 627D, 801N, 820N, 822D, 836B, 841N, 844B.

(vi) In conspiracy with the individual defendants as (v) above and in the same time periods, VINDMAN, Alexander, VINDMAN, Yvgeney, and AUSTIN as officers of defendant ARMY, acted in further conspiracies with state executive branch and military leaders including, without limitation, Colonel Warren WILKINS, Washington Army National Guard, during and after WILKINS served as a direct report of Lead Plaintiff at LazerSoft

in 1986-1989, and with police powers at (v) above and as described at paragraphs 112, 320f, 394, 436, 438, 439, 834.

(vii) GARLAND, directly inculpated and personally acquainted with Lead Plaintiff in 1974-1976 at Washington State University as Robert Mandich (paragraphs 5, 99m, 105 table, 211, 226, 419, 801G, 833F, 840C), and plausibly as Stuart Bettesworth at Decatur High School in 1970-1973 (paragraphs 5, 99m, 417-418), all while defendant BREYER ran the illegal human medical experimentation and BRMT bioweapon program, further conspired in illegal program continuity into the present time with state and local police powers operations NYPD, NJSP, PAPD, NJTPD, and other police powers department and agencies during two specific visits he made to the Southern District of New York and the District of New Jersey on November 27, 2023, and at other unknown times subject to discovery.

(viii) Defendant UNITED STATES, through JACKSON, SULLIVAN, NICKLESS, WASEMAN, CASTRO, Paul SMITH, Peter LEBLOND, and others acted in conspiracy with MARICOPA SHERIFF, ARPAIO, and with other as yet unknown police powers and departments and agencies in the U.S. and with intelligence and police powers of foreign nations using undercover brokers and associated entities DALEUSKI (DC Intl), VANGCHHIA (AGI), CHO (LEVERSTONE), CRAFT and HABERER (ABT), (paragraphs 149 table, 226 table, 478, 678B emails), to directly interfere in the legitimate interstate commerce of Lead Plaintiff's company's Winnett Perico and its subsidiaries, and Sheldon Beef, Inc., through which Lead Plaintiff acted and intended to derive business and personal income and benefits in and through affecting interstate commerce. These acts, violations, and injuries affecting interstate commerce, rights including property and employment included, without limitation, acts which were fraudulent and in

the complete absence of any legal cause under color of law, interfering with and affecting relationships with investors, bank and private debt financing, marketing, sales leads, sales opportunities, website development, employment of consultants, hiring of executive recruiters, recruitment and employment of qualified personnel, through their illegal solicitation of backdated stock options, in interstate travel, fraudulent suppliers of goods and services, fraudulent offerings of agricultural properties, fraudulent contractual arrangements for domestic and international sales, as related herein at paragraphs 639 through 694.

(ix) Defendant UNITED STATES (most particularly and without limitation defendants DOJ, FBI, CIA, USMS) conspired with state and local governments and their police powers as identified herein, in operations and in allocation of illegal and abusive color of law police powers operations, together with bad faith private actors, among these defendants as described at paragraphs 102, 462-489, 502-507, 516, 526-592, 603, 611, 613, 628, 633, 634 in the allocation of responsibility for color of law acts against the Lead Plaintiff by those defendants related to constitutional rights, employment discrimination, sex traps, illegal conspiracy to cover-up of an illegal color of law terror investigation, and myriad other conspiracies and acts alleged in this complaint.

F. Each and every individual and institutional defendant identified at 845E had the legal duty and authority to report and/or to terminate the illegal conduct described throughout this complaint, and to terminate their own direct role in these criminal acts. They did not do so whether then acting as line, supervisory, management, or executive personnel, despite their sworn legal duty and the extensive protections afforded under 5 U.S.C. § 2302(b)(8) to whistleblowers related to reporting, investigating, and prosecuting illegal and criminal acts of government. These acts and injuries are representative of those perpetrated by defendants on this

class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	**Facts - Subcount Series**	**Subcount(s)**
600-603	NSEC National Security Pretexting and Entanglements	1-4
604-620	HEXP Illegal Human Experimentation	1-17
621-637	RGTS Individual Rights Violations and Conspiracies	1-17
639-693	RICO Racketeering	1-55
694-710	LTHL Lethality Attempts	1-17

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846. CLAIMS FOR RELIEF - COUNT 46

Violations of Constitutional Rights Under the First, Third, Fourth, Fifth, Eighth, Ninth, Thirteenth, Fourteenth Amendments

Neglect To Protect – Failure to Properly Supervise

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. §§ 1961-1968; 42 U.S.C. §§ 1981, 1982, 1983, 1985, 1986, 1994
Washington:	RCW §§ 9A.80.010, 42.20.100
New Jersey:	NJ Stat §§ 10:6-2, 59:2-2, 59:3-14
New York:	New York Penal L. §§ 100.00, 100.10, 105.15, 115.00, 115.05, 460.00 through 460.80
California:	NA
Massachusetts:	NA
Arizona:	AZ Rev Stat § 11-441
Texas:	NA
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Paragraph 845 is particularly incorporated herein for its specific relevance to this paragraph 846. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph. as well as state statutes in all originating locations, many of which are unknown at the time of this Complaint and will be available upon discovery,

B. Defendants have and do plan, conspire, perpetrate and engage, at all times since approximately 1968, in direct and explicit acts, violations, and injuries against the unwitting Lead Plaintiff and even prior to the time acted against others in this class of plaintiffs including, without limitation, his now deceased father and other extended family members, who did or do practice the Quaker-based religion of Lead Plaintiff's family from at least the time of the Civil War (paragraph 409). Defendants have and do violate 18 U.S.C. §§ 1961-1968 inclusive of all sections defined at § 1961; 42 U.S.C. §§ 1981, 1982, 1983, 1985, 1994, and state statutes in an

unknown number of states, in a knowing and willfully negligent manner as they have and do fail to properly supervise personnel and allocate resources to and protect and prevent acts, violations, and injuries to constitutional and statutory rights of this class of plaintiffs, and in fact, acted jointly and severally to align their various teams, details, and organizations to injure Lead Plaintiff and other members of this class of plaintiffs by systematically failing to comply with their sworn oath to preserve, protect, and defend the Constitution, their fellow citizens themselves, the rights and properties of those fellow citizens, and the personal relationships, homes, and families of those fellow citizens, of this entire class of similarly situated plaintiffs. This purposeful and willful negligence actively furthered their series of schemes, conspiracies, frauds, thefts, and deprivations to these plaintiffs, their families, personal relations and relationships, their careers, reputations, fortunes, and business interests, including closely held business entities as specifically cited and described in the subcounts at paragraphs 600-710 in this complaint, both within and without the territory of these states and of the United States.

C. Among other acts in conspiracy with state and local governments and their police powers, defendant UNITED STATES acted with MARICOPA SHERIFF, ARPAIO, and other as yet unknown police powers departments and agencies in the U.S. and foreign nations, to directly interfere in and to adversely affect the legitimate interstate commerce of Lead Plaintiff's company's Winnett Perico and its subsidiaries, and Sheldon Beef, Inc., from which Lead Plaintiff acted for the purpose of, and intended to derive income and benefits through affecting interstate commerce from, including, without limitation, by fraudulently and in the complete absence of any legal cause, interfering with and affecting relationships with investors, bank and private debt financing, marketing, sales leads, sales opportunities, website development, employment of consultants, hiring of executive recruiters, recruitment and employment of qualified personnel, through their illegal solicitation of backdated stock options, in interstate

travel, fraudulent suppliers of goods and services, fraudulent offerings of agricultural properties, fraudulent contractual arrangements for domestic and international sales, as related herein at paragraphs 639 through 694. Defendant UNITED STATES (most particularly and without limitation defendants DOJ, FBI, CIA, USMS) conspired with state and local governments and their police powers as identified herein, in operations and in allocation of illegal and abusive color of law police powers operations, together with bad faith private actors, among these defendants as described at paragraphs 102, 462-489, 502-507, 516, 526-592, 603, 611, 613, 628, 633, 634 in the allocation of responsibility for color of law acts against the Lead Plaintiff by those defendants related to constitutional rights, employment discrimination, sex traps, illegal conspiracy and cover-up of an illegal color of law terror investigation, and myriad other acts alleged in this complaint.

D. Each and every individual and institutional defendant identified at 845E and in this paragraph 846 had the legal duty and authority to report and/or to terminate the illegal conduct described throughout this complaint, and to terminate their own direct role in these criminal acts. They did not do so whether then acting as line, supervisory, management, or executive personnel, despite their sworn legal duty and the extensive protections afforded under 5 U.S.C. § 2302(b)(8) to whistleblowers related to reporting, investigating, and prosecuting illegal and criminal acts of government. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families,

(b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	**Facts - Subcount Series**	**Subcount(s)**
600-603	NSEC National Security Pretexting and Entanglements	1-4
604-620	HEXP Illegal Human Experimentation	1-17
621-637	RGTS Individual Rights Violations and Conspiracies	1-17
639-693	RICO Racketeering	1-55
694-710	LTHL Lethality Attempts	1-17

[Intentionally left blank.]

847. CLAIMS FOR RELIEF - COUNT 47

Violations of Constitutional Rights Under the First, Third, Fourth, Fifth, Eighth, Ninth, Thirteenth, Fourteenth Amendments

Neglect To Protect – Failure to Properly Train

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. §§ 1961-1968; 42 U.S.C. §§ 1981, 1982, 1983, 1985, 1986, 1994
Washington:	RCW §§ 9A.80.010, 42.20.100
New Jersey:	NJ Stat §§ 10:6-2, 59:2-2, 59:3-14
New York:	New York Penal L. §§ 100.00, 100.10, 105.15, 115.00, 115.05, 460.00 through 460.80
California:	NA
Massachusetts:	NA
Arizona:	AZ Rev Stat § 11-441
Texas:	NA
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Paragraph 845 is particularly incorporated herein for its specific relevance to this paragraph 847. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph. as well as state statutes in all originating locations, many of which are unknown at the time of this Complaint and will be available upon discovery,

B. Defendants have and do plan, conspire, perpetrate and engage, at all times since approximately 1968, in direct and explicit acts, violations, and injuries against the unwitting Lead Plaintiff and even prior to the time acted against others in this class of plaintiffs including, without limitation, his now deceased father and other extended family members, who did or do practice the Quaker-based religion of Lead Plaintiff's family from at least the time of the Civil War (paragraph 409). Defendants have and do violate 18 U.S.C. §§ 1961-1968 inclusive of all sections defined at § 1961; 42 U.S.C. §§ 1981, 1982, 1983, 1985, 1986, 1994, and state statutes

in an unknown number of states, in a knowing and willfully negligent manner as they have and do fail to properly train personnel and allocate resources to and protect and prevent acts, violations, and injuries to constitutional and statutory rights of this class of plaintiffs, and in fact, acted jointly and severally to improperly initially train, retrain, instruct, and align their various teams, details, and organizations to injure Lead Plaintiff and other members of this class of plaintiffs by systematically failing to comply with their sworn oath to preserve, protect, and defend the Constitution, their fellow citizens themselves, the rights and properties of those fellow citizens, and the personal relationships, homes, and families of those fellow citizens, of this entire class of similarly situated plaintiffs. This purposeful and willful negligence actively furthered their series of schemes, conspiracies, frauds, thefts, and deprivations to these plaintiffs, their families, personal relations and relationships, their careers, reputations, fortunes, and business interests, including closely held business entities as specifically cited and described in the subcounts at paragraphs 600-710 in this complaint, both within and without the territory of these states and of the United States.

C. Among other acts in conspiracy with state and local governments and their police powers, defendant UNITED STATES acted in conspiracy with MARICOPA SHERIFF, ARPAIO, and other as yet unknown police powers departments and agencies in the U.S. and foreign nations, to directly interfere in the legitimate interstate commerce of Lead Plaintiff's company's Winnett Perico and its subsidiaries, and Sheldon Beef, Inc., from which Lead Plaintiff acted for the purpose of, and intended to derive income and benefits through interstate commerce from, including, without limitation by fraudulently and in the complete absence of any legal cause, interfering with and affecting relationships with investors, bank and private debt financing, marketing, sales leads, sales opportunities, website development, employment of consultants, hiring of executive recruiters, recruitment and employment of qualified personnel,

through their illegal solicitation of backdated stock options, in interstate travel, fraudulent suppliers of goods and services, fraudulent offerings of agricultural properties, fraudulent contractual arrangements for domestic and international sales, as related herein at paragraphs 639 through 694. Defendant UNITED STATES (most particularly and without limitation defendants DOJ, FBI, CIA, USMS) conspired with state and local governments and their police powers as identified herein, in operations and in allocation of illegal and abusive color of law police powers operations, together with bad faith private actors, among these defendants as described at paragraphs 102, 462-489, 502-507, 516, 526-592, 603, 611, 613, 628, 633, 634 in the allocation of responsibility for color of law acts against the Lead Plaintiff by those defendants related to constitutional rights, employment discrimination, sex traps, illegal conspiracy to cover-up of an illegal color of law terror investigation, and myriad other acts alleged in this complaint.

D. Each and every individual and institutional defendant identified at 845E and in this paragraph 847 had the legal duty and authority to report and/or to terminate the illegal conduct described throughout this complaint, and to terminate their own direct role in these criminal acts. They did not do so whether then acting as line, supervisory, management, or executive personnel, despite their sworn legal duty and the extensive protections afforded under 5 U.S.C. § 2302(b)(8) to whistleblowers related to reporting, investigating, and prosecuting illegal and criminal acts of government. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families,

(b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	**Facts - Subcount Series**	**Subcount(s)**
600-603	NSEC National Security Pretexting and Entanglements	1-4
604-620	HEXP Illegal Human Experimentation	1-17
621-637	RGTS Individual Rights Violations and Conspiracies	1-17
639-693	RICO Racketeering	1-55
694-710	LTHL Lethality Attempts	1-17

[Intentionally left blank.]

848. CLAIMS FOR RELIEF - COUNT 48

Violations of Constitutional Rights Under the First, Third, Fourth, Fifth, Eighth, Ninth, Thirteenth, Fourteenth Amendments

Neglect To Protect - Misprison of Felony

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. §§ 1961-1968; 42 U.S.C. §§ 1981, 1982, 1983, 1985, 1986, 1994
Washington:	RCW §§ 9A.80.010, 42.20.100
New Jersey:	NJ Stat §§ 10:6-2, 59:2-2, 59:3-14
New York:	New York Penal L. §§ 100.00, 100.10, 105.15, 115.00, 115.05, 460.00 through 460.80
California:	NA
Massachusetts:	NA
Arizona:	AZ Rev Stat § 11-441
Texas:	NA
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Paragraph 845 is particularly incorporated herein for its specific relevance to this paragraph 848. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph, as well as state statutes in all originating locations, many of which are unknown at the time of this Complaint and will be available upon discovery,

B. Defendants have and do plan, conspire, perpetrate and engage as follows: Without excusing any defendant in this action for their knowing and willful violations of rights and conspiracies against rights, all police powers defendants at all levels of government in this action are particularly and specifically inculpated, given their particular education, training, experience and sworn oaths, for each and every knowing and willful act, violation, and injury to rights and the conspiracies related thereto both as institutional defendants and as individual defendants for

all constitutional rights violations in accord with 28 USC § 2679(b)(2), under 18 U.S.C. 4 misprison of felony, as follows (emphasis added):

> "**Whoever,** having knowledge of the actual commission of a felony cognizable by a court of the United States, conceals and does not as soon as possible make known the same to some judge or other person in civil or military authority under the United States, shall be fined under this title or imprisoned not more than three years, or both."

C. Whereas, the formerly unwitting Lead Plaintiff has made these acts known in writing by hand delivery to U.S. Attorney's offices in three federal districts on approximately 4 dozen occasions, to the Executive Office of the President by mail and/or by hand delivery on at least two occasions, to the FBI headquarters and to the Justice Department headquarters by hand delivery on at least one occasion and during at least one additional thwarted attempt where he was intercepted by unformed police personnel who first misdirected then blocked access to the building, to a member of Congress directly in person on at least one occasion, to the Supreme Court where it was rejected by action of the Clerk's office on at least two occasions, attempted to be delivered through the USPS to GARLAND and to defendant DOJ prosecutors Jack Smith and Robert Hur wherein it was blocked from delivery by USPS, and whereas former Supreme Court Associate Justice BREYER, and former Appellate Court Judge and Attorney General GARLAND are directly inculpated by acts in the 1970s and by their eventual specific identifications in 2023 and 2024 in this pattern of knowing and willful acts, violations, and injuries to Lead Plaintiff and most probably to other members of this class of plaintiffs, this pervasive and durable pattern of misprison of felony by these police powers defendants in conspiracies against rights is clear, transparent, and obvious. A reasonable person must simply be prepared to look at facts, and to avoid the willful blindness in these fraudulent concealments, so

as to see this pervasive pattern for these defendants in their failure to act in accordance with their sworn duty to act.

D. Defendants UNITED STATES and all other defendants with police powers, among other acts, injuries, and violations at the final subparagraph in this paragraph, both within and without the territory of the United States, have at all times since approximately 1968 acted in direct and explicit acts, violations, and injuries against the unwitting Lead Plaintiff and even prior to the time, acted against others in this class of plaintiffs including, without limitation, his now deceased father and other extended family members, who did or do practice the Quaker-based religion of Lead Plaintiff's family from at least the time of the Civil War (paragraph 409). Defendants have and do violate 18 U.S.C. §§ 1961-1968 inclusive of all sections defined at § 1961 cited herein; 42 U.S.C. §§ 1981, 1982, 1983, 1985, 1994, and state statutes in an unknown number of states, in a knowing and willfully negligent manner as they have and do fail to properly execute their sworn duties, and to supervise, train, and educate personnel, and to allocate resources to protect rights and to prevent acts, violations, and injuries to constitutional and statutory rights of this class of plaintiffs, and in fact, have and do act jointly and severally to align their various teams, details, and organizations to injure Lead Plaintiff and other members of this class of plaintiffs by systematically failing to comply with their sworn oath to preserve, protect, and defend the Constitution, their fellow citizens themselves, the rights and properties of those fellow citizens, and the personal relationships, homes, and families of those fellow citizens, of this entire class of similarly situated plaintiffs. This purposeful and willful negligence has and does actively further their series of schemes, conspiracies, frauds, thefts, and deprivations to these plaintiffs, their families, personal relations and relationships, their careers, reputations, fortunes, and business interests, including closely held business entities as specifically cited and

described in the subcounts at paragraphs 600-710 in this complaint, both within and without the territory of these states and of the United States.

E. Defendants with police powers have so engaged jointly and severally to improperly task, command, and control their forces, officers, agents, confidential informants, contractors, and others in these acts, injuries, and violations, and acted to train those persons and align their various teams, details, and organizations to act in continuous attempts and conspiracies to injure the persons, rights, and property interests of Lead Plaintiff and other members of this class of plaintiffs by systematically failing to comply with their sworn oath to preserve, protect, and defend the Constitution, their fellow citizens themselves, the rights and properties of those fellow citizens, and the personal relationships, homes, and families of those fellow citizens, of this entire class of similarly situated plaintiffs. This purposeful and willful negligence actively furthered their series of schemes, conspiracies, frauds, thefts, and deprivations to these plaintiffs, their families, personal relations and relationships, their careers, reputations, fortunes, and business interests, including closely held business entities as specifically cited and described in the subcounts at paragraphs 600-710 in this complaint, both within and without the territory of these states and of the United States.

F. Among other acts in conspiracy with state and local governments and their police powers, defendant UNITED STATES acted in conspiracy with MARICOPA SHERIFF, ARPAIO, and other as yet unknown police powers departments and agencies in the U.S. and foreign nations, to directly interfere in the legitimate interstate commerce of Lead Plaintiff's company's Winnett Perico and its subsidiaries, and Sheldon Beef, Inc., from which Lead Plaintiff acted for the purpose of, and intended to derive income and benefits through activities affecting interstate commerce from, including, without limitation by fraudulently and in the complete absence of any legal cause, interfering with and affecting relationships with investors,

bank and private debt financing, marketing, sales leads, sales opportunities, website development, employment of consultants, hiring of executive recruiters, recruitment and employment of qualified personnel, through their illegal solicitation of backdated stock options, in interstate travel, fraudulent suppliers of goods and services, fraudulent offerings of agricultural properties, fraudulent contractual arrangements for domestic and international sales, as related herein at paragraphs 639 through 694. Defendant UNITED STATES (most particularly and without limitation defendants DOJ, FBI, CIA, USMS) conspired with state and local governments and their police powers as identified herein, in operations and in allocation of illegal and abusive color of law police powers operations, together with bad faith private actors, among these defendants as described at paragraphs 102, 462-489, 502-507, 516, 526-592, 603, 611, 613, 628, 633, 634 in the allocation of responsibility for color of law acts against the Lead Plaintiff by those defendants related to constitutional rights, employment discrimination, sex traps, illegal conspiracy to cover-up of an illegal color of law terror investigation, and myriad other acts alleged in this complaint.

G. Each and every individual and institutional defendant identified at 845E and in this paragraph 848 had the legal duty and authority to report and/or to terminate the illegal conduct described throughout this complaint, and to terminate their own direct role in these criminal acts. They did not do so whether then acting as line, supervisory, management, or executive personnel, despite their sworn legal duty and the extensive protections afforded under 5 U.S.C. § 2302(b)(8) to whistleblowers related to reporting, investigating, and prosecuting illegal and criminal acts of government. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs

perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	**Facts - Subcount Series**	**Subcount(s)**
600-603	NSEC National Security Pretexting and Entanglements	1-4
604-620	HEXP Illegal Human Experimentation	1-17
621-637	RGTS Individual Rights Violations and Conspiracies	1-17
639-693	RICO Racketeering	1-55
694-710	LTHL Lethality Attempts	1-17

[Intentionally left blank.]

849. CLAIMS FOR RELIEF - COUNT 49

Violations of Constitutional Rights Under the First, Third, Fourth, Fifth, Eighth, Ninth, Thirteenth, Fourteenth Amendments

Neglect To Protect - Acting as Accomplice

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. §§ 1961-1968; 42 U.S.C. §§ 1981, 1982, 1983, 1985, 1986, 1994
Washington:	RCW §§ 9A.80.010, 42.20.100
New Jersey:	NJ Stat §§ 10:6-2, 59:2-2, 59:3-14
New York:	New York Penal L. §§ 100.00, 100.10, 105.15, 115.00, 115.05, 460.00 through 460.80
California:	NA
Massachusetts:	NA
Arizona:	AZ Rev Stat § 11-441
Texas:	NA
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Paragraph 845 is particularly incorporated herein for its specific relevance to this paragraph 849. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph. as well as state statutes in all originating locations, many of which are unknown at the time of this Complaint and will be available upon discovery,

B. Defendants have and do plan, conspire, perpetrate and engage, at all times since approximately 1968, in direct and explicit acts, violations, and injuries against the unwitting Lead Plaintiff and even prior to the time acted against others in this class of plaintiffs including, without limitation, his now deceased father and other extended family members, who did or do practice the Quaker-based religion of Lead Plaintiff's family from at least the time of the Civil War (paragraph 409). Defendants have and do act in a knowingly and willfully negligent manner to fail in their duties as departments, agencies, organizations, groups, individual sworn officers and agents, and as individual citizens, and have in fact, acted negligently and willfully as

principals (18 U.S.C. § 2) as described throughout the claims for relief counts herein, and as accomplices (18 U.S.C. § 3) during the conduct, aiding, and abetting of the acts, violations, and injuries described in this complaint, and those which will come to light through the discovery process, in their (i) failure to report illegal acts; (ii) failure to report violations of rules and regulations essential to good order and discipline within departments and agencies; (iii) have acted as accessories to criminal acts and civil violations; (iv) have acted as accomplices to criminal acts and civil violations; (v) have aided and abetted others and each other in acts, violations, and injuries; which have and do directly injure Lead Plaintiff and other plaintiffs of this class including, without limitation, in all forms of liberty, rights, property, and commerce.

C. Defendants with police powers have so engaged jointly and severally to improperly train, supervise, command, task, and control their forces, officers, agents, confidential informants, contractors, and others in these acts, injuries, and violations, and acted to train those persons and align their various teams, details, and organizations to act in continuous attempts and conspiracies to injure the persons, rights, and property interests of Lead Plaintiff and other members of this class of plaintiffs, by systematically failing to comply with their sworn oath to preserve, protect, and defend the Constitution, their fellow citizens themselves, the rights and properties of those fellow citizens, and the personal relationships, homes, and families of those fellow citizens, of this entire class of similarly situated plaintiffs. This purposeful and willful negligence actively furthered their series of schemes, conspiracies, frauds, thefts, and deprivations to these plaintiffs, their families, personal relations and relationships, their careers, reputations, fortunes, and business interests, including closely held business entities as specifically cited and described in the subcounts at paragraphs 600-710 in this complaint, both within and without the territory of these states and of the United States.

D. Among other acts in conspiracy with state and local governments and their police powers, defendant UNITED STATES acted in conspiracy with MARICOPA SHERIFF, ARPAIO, and other as yet unknown police powers departments and agencies in the U.S. and foreign nations, to directly interfere in the legitimate interstate commerce of Lead Plaintiff's company's Winnett Perico and its subsidiaries, and Sheldon Beef, Inc., from which Lead Plaintiff acted for the purpose of, and intended to derive income and benefits through interstate commerce from, including, without limitation by fraudulently and in the complete absence of any legal cause, interfering with and affecting relationships with investors, bank and private debt financing, marketing, sales leads, sales opportunities, website development, employment of consultants, hiring of executive recruiters, recruitment and employment of qualified personnel, through their illegal solicitation of backdated stock options, in interstate travel, fraudulent suppliers of goods and services, fraudulent offerings of agricultural properties, fraudulent contractual arrangements for domestic and international sales, as related herein at paragraphs 639 through 694. Defendant UNITED STATES (most particularly and without limitation defendants DOJ, FBI, CIA, USMS) conspired with state and local governments and their police powers as identified herein, in operations and in allocation of illegal and abusive color of law police powers operations, together with bad faith private actors, among these defendants as described at paragraphs 102, 462-489, 502-507, 516, 526-592, 603, 611, 613, 628, 633, 634 in the allocation of responsibility for color of law acts against the Lead Plaintiff by those defendants related to constitutional rights, employment discrimination, sex traps, illegal conspiracy to cover-up of an illegal color of law terror investigation, and myriad other acts alleged in this complaint.

E. Each and every individual and institutional defendant identified at 845E and in this paragraph 849 had the legal duty and authority to report and/or to terminate the illegal conduct described throughout this complaint, and to terminate their own direct role in these criminal acts.

They did not do so whether then acting as line, supervisory, management, or executive personnel, despite their sworn legal duty and the extensive protections afforded under 5 U.S.C. § 2302(b)(8) to whistleblowers related to reporting, investigating, and prosecuting illegal and criminal acts of government. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	Facts - Subcount Series	Subcount(s)
600-603	NSEC National Security Pretexting and Entanglements	1-4
604-620	HEXP Illegal Human Experimentation	1-17
621-637	RGTS Individual Rights Violations and Conspiracies	1-17
639-693	RICO Racketeering	1-55
694-710	LTHL Lethality Attempts	1-17

850. CLAIMS FOR RELIEF - COUNT 50

Violations of Constitutional Rights Under the First, Third, Fourth, Fifth, Eighth, Ninth, Thirteenth, Fourteenth Amendments

Neglect To Protect - Acting as Accessory

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. §§ 1961-1968; 42 U.S.C. §§ 1981, 1982, 1983, 1985, 1986, 1994
Washington:	RCW §§ 9A.80.010, 42.20.100
New Jersey:	NJ Stat §§ 10:6-2, 59:2-2, 59:3-14
New York:	New York Penal L. §§ 100.00, 100.10, 105.15, 115.00, 115.05, 460.00 through 460.80
California:	NA
Massachusetts:	NA
Arizona:	AZ Rev Stat § 11-441
Texas:	NA
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Paragraph 845 is particularly incorporated herein for its specific relevance to this paragraph 850. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph. as well as state statutes in all originating locations, many of which are unknown at the time of this complaint and will be available upon discovery,

B. Defendants have and do plan, conspire, perpetrate and engage, at all times since approximately 1968, in direct and explicit acts, violations, and injuries against the unwitting Lead Plaintiff and even prior to the time acted against others in this class of plaintiffs including, without limitation, his now deceased father and other extended family members, who did or do practice the Quaker-based religion of Lead Plaintiff's family from at least the time of the Civil War (paragraph 409). Defendants have and do act in a knowingly and willfully negligent manner to fail in their duties as departments, agencies, organizations, groups, individual sworn

officers and agents, and as individual citizens, and have in fact, acted negligently and willfully as principals (18 U.S.C. § 2), and as accessories (18 U.S.C. § 3) to aid and abet perpetration, and in some cases to direct, command, and/or task the perpetration by forces under their command and control, of the acts, violations, and injuries described in this complaint, and those which will come to light through the discovery process, in their (i) failure to report illegal acts; (ii) failure to report violations of rules and regulations essential to good order and discipline within departments and agencies; (iii) have acted as accessories to criminal acts and civil violations; (iv) have acted as accomplices to criminal acts and civil violations; (v) have aided and abetted others and each other in acts, violations, and injuries; which have and do directly injure Lead Plaintiff and other plaintiffs of this class including, without limitation, in all forms of liberty, rights, property, and affecting in-state, interstate, and international commerce.

C. Defendants with police powers have so engaged jointly and severally to improperly train, supervise, command, task, and control their forces, officers, agents, confidential informants, contractors, and others in these acts, injuries, and violations, and acted to train those persons and align their various teams, details, and organizations to act in continuous attempts and conspiracies to injure the persons, rights, and property interests of Lead Plaintiff and other members of this class of plaintiffs, by systematically failing to comply with their sworn oath to preserve, protect, and defend the Constitution, their fellow citizens themselves, the rights and properties of those fellow citizens, and the personal relationships, homes, and families of those fellow citizens, of this entire class of similarly situated plaintiffs. This purposeful and willful negligence actively furthered their series of schemes, conspiracies, frauds, thefts, and deprivations to these plaintiffs, their families, personal relations and relationships, their careers, reputations, fortunes, and business interests, including closely held business entities as

specifically cited and described in the subcounts at paragraphs 600-710 in this complaint, both within and without the territory of these states and of the United States.

D. Among other acts in conspiracy with state and local governments and their police powers, defendant UNITED STATES acted in conspiracy with MARICOPA SHERIFF, ARPAIO, and other as yet unknown police powers departments and agencies in the U.S. and foreign nations, to directly interfere in the legitimate interstate commerce of Lead Plaintiff's company's Winnett Perico and its subsidiaries, and Sheldon Beef, Inc., from which Lead Plaintiff acted for the purpose of, and intended to derive income and benefits through interstate commerce from, including, without limitation by fraudulently and in the complete absence of any legal cause, interfering with and affecting relationships with investors, bank and private debt financing, marketing, sales leads, sales opportunities, website development, employment of consultants, hiring of executive recruiters, recruitment and employment of qualified personnel, through their illegal solicitation of backdated stock options, in interstate travel, fraudulent suppliers of goods and services, fraudulent offerings of agricultural properties, fraudulent contractual arrangements for domestic and international sales, as related herein at paragraphs 639 through 694. Defendant UNITED STATES (most particularly and without limitation defendants DOJ, FBI, CIA, USMS) conspired with state and local governments and their police powers as identified herein, in operations and in allocation of illegal and abusive color of law police powers operations, together with bad faith private actors, among these defendants as described at paragraphs 102, 462-489, 502-507, 516, 526-592, 603, 611, 613, 628, 633, 634 in the allocation of responsibility for color of law acts against the Lead Plaintiff by those defendants related to constitutional rights, employment discrimination, sex traps, illegal conspiracy to cover-up an illegal color of law terror investigation, and myriad other acts alleged in this complaint.

E. Each and every individual and institutional defendant identified at 845E and in this paragraph 850 had the legal duty and authority to report and/or to terminate the illegal conduct described throughout this complaint, and to terminate their own direct role in these criminal acts. They did not do so whether then acting as line, supervisory, management, or executive personnel, despite their sworn legal duty and the extensive protections afforded under 5 U.S.C. § 2302(b)(8) to whistleblowers related to reporting, investigating, and prosecuting illegal and criminal acts of government. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	Facts - Subcount Series	Subcount(s)
600-603	NSEC National Security Pretexting and Entanglements	1-4
604-620	HEXP Illegal Human Experimentation	1-17
621-637	RGTS Individual Rights Violations and Conspiracies	1-17
639-693	RICO Racketeering	1-55
694-710	LTHL Lethality Attempts	1-17

851. CLAIMS FOR RELIEF - COUNT 51

Violations of Constitutional Rights Under the First, Third, Fourth, Fifth, Eighth, Ninth, Thirteenth, Fourteenth Amendments

Neglect To Protect - Aiding and Abetting

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	18 U.S.C. §§ 1961-1968; 42 U.S.C. §§ 1981, 1982, 1983, 1985, 1986, 1994
Washington:	RCW § 9A.80.010, 42.20.100
New Jersey:	NJ Stat §§ 10:6-2, 59:2-2, 59:3-14
New York:	New York Penal L. §§ 100.00, 100.10, 105.15, 115.00, 115.05, 460.00 through 460.80
California:	NA
Massachusetts:	NA
Arizona:	AZ Rev Stat § 11-441
Texas:	NA
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Paragraph 845 is particularly incorporated herein for its specific relevance to this paragraph 851. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph. as well as state statutes in all originating locations, many of which are unknown at the time of this Complaint and will be available upon discovery,

B. Defendants have and do plan, conspire, perpetrate and engage, at all times since approximately 1968, in direct and explicit acts, violations, and injuries against the unwitting Lead Plaintiff and even prior to the time acted against others in this class of plaintiffs including, without limitation, his now deceased father and other extended family members, who did or do

practice the Quaker-based religion of Lead Plaintiff's family from at least the time of the Civil War (paragraph 409). Defendants have and do act in a knowingly and willfully negligent manner to fail in their duties as departments, agencies, organizations, groups, individual sworn officers and agents, and as individual citizens, and have in fact, acted negligently and willfully as principals (18 U.S.C. § 2), to aid and abet (18 U.S.C. § 3) the planning, conduct, and fraudulent concealment, thereby aiding and abetting the acts, violations, and injuries described in this complaint, and those which will come to light through the discovery process, in their (i) failure to report illegal acts; (ii) failure to report violations of rules and regulations essential to good order and discipline within departments and agencies; (iii) have acted as accessories to criminal acts and civil violations; (iv) have acted as accomplices to criminal acts and civil violations; (v) have aided and abetted others and each other in acts, violations, and injuries; which have and do directly injure Lead Plaintiff and other plaintiffs of this class including, without limitation, in all forms of liberty, rights, property, and commerce.

C. Defendants with police powers have so engaged jointly and severally to improperly train, supervise, command, task, and control their forces, officers, agents, confidential informants, contractors, and others in these acts, injuries, and violations, and acted to train those persons and align their various teams, details, and organizations to act in continuous attempts and conspiracies to injure the persons, rights, and property interests of Lead Plaintiff and other members of this class of plaintiffs, by systematically failing to comply with their sworn oath to preserve, protect, and defend the Constitution, their fellow citizens themselves, the rights and properties of those fellow citizens, and the personal relationships, homes, and families of those fellow citizens, of this entire class of similarly situated plaintiffs. This purposeful and willful negligence actively furthered their series of schemes, conspiracies, frauds, thefts, and deprivations to these plaintiffs, their families, personal relations and relationships, their careers,

reputations, fortunes, and business interests, including closely held business entities as specifically cited and described in the subcounts at paragraphs 600-710 in this complaint, both within and without the territory of these states and of the United States.

D. Among other acts in conspiracy with state and local governments and their police powers, defendant UNITED STATES acted in conspiracy with MARICOPA SHERIFF, ARPAIO, and other as yet unknown police powers departments and agencies in the U.S. and foreign nations, to directly interfere in the legitimate interstate commerce of Lead Plaintiff's company's Winnett Perico and its subsidiaries, and Sheldon Beef, Inc., from which Lead Plaintiff acted for the purpose of, and intended to derive income and benefits through interstate commerce from, including, without limitation by fraudulently and in the complete absence of any legal cause, interfering with and affecting relationships with investors, bank and private debt financing, marketing, sales leads, sales opportunities, website development, employment of consultants, hiring of executive recruiters, recruitment and employment of qualified personnel, through their illegal solicitation of backdated stock options, in interstate travel, fraudulent suppliers of goods and services, fraudulent offerings of agricultural properties, fraudulent contractual arrangements for domestic and international sales, as related herein at paragraphs 639 through 694. Defendant UNITED STATES (most particularly and without limitation defendants DOJ, FBI, CIA, USMS) conspired with state and local governments and their police powers as identified herein, in operations and in allocation of illegal and abusive color of law police powers operations, together with bad faith private actors, among these defendants as described at paragraphs 102, 462-489, 502-507, 516, 526-592, 603, 611, 613, 628, 633, 634 in the allocation of responsibility for color of law acts against the Lead Plaintiff by those defendants related to constitutional rights, employment discrimination, sex traps, illegal conspiracy in the cover-up of

an illegal color of law terror investigation, and myriad other conspiracies and acts alleged in this complaint.

E. Each and every individual and institutional defendant identified at 845E and in this paragraph 851 had the legal duty and authority to report and/or to terminate the illegal conduct described throughout this complaint, and to terminate their own direct role in these criminal acts. They did not do so whether then acting as line, supervisory, management, or executive personnel, despite their sworn legal duty and the extensive protections afforded under 5 U.S.C. § 2302(b)(8) to whistleblowers related to reporting, investigating, and prosecuting illegal and criminal acts of government. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries

to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	Facts - Subcount Series	Subcount(s)
600-603	NSEC National Security Pretexting and Entanglements	1-4
604-620	HEXP Illegal Human Experimentation	1-17
621-637	RGTS Individual Rights Violations and Conspiracies	1-17
639-693	RICO Racketeering	1-55
694-710	LTHL Lethality Attempts	1-17

852. CLAIMS FOR RELIEF - COUNT 52

Violations of Constitutional Rights Under the First, Third, Fourth, Fifth, Eighth, Thirteenth, Fourteenth Amendments

Prohibited Activities - Pattern of Racketeering Acts

United States Code:	18 U.S.C. §§ 1961-1968
Washington:	RCW § 9A.82.010(12)
New Jersey:	NJ Stat §§ 2C:41-1 through 2C:41-6, 10:6-2, 59:2-2, 59:3-14
New York:	New York Penal L. §§ 100.00, 100.10, 105.15, 115.00, 115.05, 190.25, 460.00 through 460.80
California:	Cal Penal Code §§ 236, 236.1(a) Cal Labor Code §§ 2801, 2802 Cal Civil Code §§ 1708-1725
Massachusetts:	Mass Gen L ch 271a §§ 1-3
Arizona:	AZ Rev Stat §§ 11-441, 13-2308, 13-2310 through 2312
Texas:	TX Penal Code §§ 20A.02, 22.01, 22.02, 32.01 through 32.03, 32.42, 71.02
Maryland:	MD Criminal Law Code §§ 9-801 through 9-805

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph. as well as state statutes in all originating locations, many of which are unknown at the time of this Complaint and will be available upon discovery,

B. Defendants have and do plan, conspire, perpetrate and engage in at all times since approximately 1968 acted in their series of schemes, conspiracies, deprivations, blocking, screening and other related acts, violations, and injuries targeting, directed to, and directed at the Lead Plaintiff and his closely held business entities. Among other acts, injuries, and violations at the final subparagraph in this paragraph, both within and without the territory of the United States, this systematic associated-in-fact enterprise pattern of racketeering acts has been planned, directed, managed, and operated by persons who have been at times directly embedded within these private businesses while the businesses seek business opportunities, engage in, and affect interstate commerce, bid and worked on federally funded projects for various governmental departments, agencies, districts, and institutions partially or wholly funded through interstate commerce, even as these defendants have and do directly surreptitiously manage and direct Lead Plaintiff's personal affairs and finances while engaged in and affecting interstate commerce, all in systematic violations of constitutional rights, and through defendants' associated-in-fact enterprise pattern of racketeering acts used to sustain and perpetuate the illegal BRMT bioweapon and bioweapon delivery system program, and its fraudulent concealment through color of law abuse of state secret privilege..

C. Defendants have and do violate human, Constitutional, civil rights and laws by engaging in a continuous pattern of racketeering activity against the Lead Plaintiff and other members of this class of plaintiffs at least since the Lead Plaintiff was a minor child. Additional particular details are both unknown and unrecollected at the time of this complaint and will be available to be introduced upon proper discovery. Detailed examples of this long-running, comprehensive, and systematic pattern of racketeering acts and defendants' series' of violations, acts, deprivations, and injuries are found in the subcounts at paragraphs 600-710, and are

representative of these types of violations, acts, injuries, and deprivations experienced by other plaintiff members of this class.

D. Under 18 U.S.C. § 1962 (c):

(i) "It shall be unlawful for any person employed by or associated with any enterprise engaged in, or the activities of which affect, interstate or foreign commerce, to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity or collection of unlawful debt."

A careful parsing of each phrase of subsection 1962(c) clearly conveys the culpability of these defendants in the violations related herein by defendant UNITED STATES and by all other institutional and individual defendants, both named and as yet unnamed and unknown. Subsection 1962(c) is parsed phrased by phrase below, specifically analyzing each element, with emphasis added where appropriate:

(i) 1962(c): It shall be unlawful for any person…

18 USC § 1961 definitions subsection (3")"person" includes any individual or entity capable of holding a legal or beneficial interest in property;"

Discussion: All named defendants are individuals and entities which can, have, and do hold property as defined under law to include both tangible and intangible assets and rights or claims to assets.

(ii) 1962(c): …employed by or associated with…

Discussion: In *Reves v. Ernst & Young*, 507 U.S. 170, 185 (1993) the Supreme Court held that:

"One must participate in the operation or management of the enterprise itself in order to be subject to § 1962(c) liability."

Persons (individuals and entities) who are employed by (including through relationships such as personal employment, contracts, and such) or associated with (loosely affiliated in some form or fashion through acquaintance, mutual aid, or other

relationship) includes myriad forms of relationships ranging from formal employment as for officers and agents, informal associations by acquaintance as in other police powers, press, media, entertainment, and informants, police unions, political and community organizations of all kinds and types provided they engage in operation or management of the enterprise through such activities as promoting, directing, planning, supervising, conducting, aiding, abetting, and concealing. These defendants have and do meet these tests in *Reves*, as they participated in and managed operations.

(iii) 1962(c): …any enterprise engaged in, …… interstate or foreign commerce,...

18 USC § 1961 definitions subsection "(4)"enterprise" includes any individual, partnership, corporation, association, or other legal entity, and any union or group of individuals associated in fact although not a legal entity;"

Boyle v. United States, 556 U.S. 938 (2009):

"As we succinctly put it in *Turkette,* an association-in-fact enterprise is "a group of persons associated together for a common purpose of engaging in a course of conduct. 452 U. S., at 583."

Discussion: These persons are known to one another through various formal and informal associations, and it is not necessary that a person who is a defendant have full knowledge of the racketeering acts of others in the enterprise to be considered part of the enterprise and to be liable for the acts of the enterprise. Fifty-six years is sufficient duration for a number persons to have entered into this common associated-in-fact enterprise, as are the many much shorter associations including, for example, a mere twenty-one months while Lead Plaintiff was domiciled as homeless at the election of defendant UNITED STATES in Boston, MA, a mere seventeen years in the case of defendants only ever operating in the greater New York City area, a mere six months for those defendants who participated only while the Lead Plaintiff was kidnapped into illegal imprisonment in a Bergen County, NJ hospital to effect duress

while homeless against a federal court civil action brought by the Lead Plaintiff, as well as for somewhat longer periods, as in the decades of racketeering acts and rights violations by those identified as having been reassigned to and/or relocated from Washington state to the greater New York City area, some to pursue alternate government positions, and others to pursue completely different professions, while still retaining privileged access directly and through their associations with defendant UNITED STATES and other police powers defendants, to access the Lead Plaintiff in his perpetuated status of involuntary servitude to defendant UNITED STATES and to the coercive and illegal operations of all these defendants.

(iv)1962(c): …or the activities of which affect, interstate or foreign commerce,,,,

18 USC 10 definitions. "The term "interstate commerce", as used in this title, includes commerce between one State, Territory, Possession, or the District of Columbia and another State, Territory, Possession, or the District of Columbia. The term "foreign commerce", as used in this title, includes commerce with a foreign country."

Discussion: The activities described throughout this complaint have been and are conducted in or affect interstate commerce, to and including all activities of Lead Plaintiff which were related to and required funds used or received directly through and/or required the use of funds derived in interstate commerce, which funds were and are directly expended by defendants or through subsidies of ostensibly private enterprises which were subsidized directly or indirectly through surreptitious cover companies, investors, and financial institutions which laundered appropriated federal funds to those persons, whether entities or individuals, AT ALL TIMES from Lead Plaintiff's first employment by Larry's Market, which was secretly owned n part by defendant UNITED STATES. Interstate commerce has been an ever present element of this associated-in-fact enterprise as to the Lead Plaintiff since at least Spring 1972,

as fderal funds have been used in every operation involving the Lead Plaintiff, his employment, and his relationships with others, the vast majority of whom were federal and other governmental employees operating undercover in civilian dress and in cover companies secretly owned and controlled by defendant UNITED STATES, its departments, agencies, and personnel..

(v) 1962(c): …to <u>conduct or participate</u>, directly or indirectly,…

Under *Reves v. Ernst & Young*, 507 U.S. 170, 185 (1993) the Supreme Court held that:

"One must participate in the operation or management of the enterprise itself in order to be subject to § 1962(c) liability."

Discussion: These defendants have and do meet these tests in *Reves.* "Conduct or participate" - conduct and meaningful participation extend to the explicit planning and execution of any act in the overall pattern of racketeering acts, including without limitation, such activities as promoting, directing, planning, supervision, conduct, aid, abet, or concealing. "Directly or indirectly" – direct and indirect participation includes acting through direct acts and through others hired or merely inspired by common interest and explicit plan or direction to the planning and execution of any act in the overall pattern of racketeering acts

(vi) 1962(c): …in the conduct of such enterprise's affairs through a <u>pattern of racketeering activity</u>…

18 USC § 1961 defines all acts which are racketeering activity at subsection 18 USC § 1961(1).

18 USC § 1961 definitions subsection (5)""pattern of racketeering activity" requires at least two acts of racketeering activity, one of which occurred after the effective date of this chapter and the last of which occurred within ten years (excluding any period of imprisonment) after the commission of a prior act of racketeering activity;"

F. Under 18 U.S.C. § 1962(d):

> "It shall be unlawful for any person to conspire to violate any of the provisions of subsection (a), (b), or (c) of this section"

The direct involvement of two or more persons (whether individuals or entities), one of whom undertakes an explicit act toward a violation of a constitutional right or toward a violation of statute, constitutes conduct sufficient to be a conspiracy under law.

G. As found in *Boyle v. United States*, 556 U.S. 938 (2009) (emphasis added):

> "From the terms of RICO, it is apparent that an association-in-fact enterprise must have at least three structural features: a purpose, relationships among those associated with the enterprise, and longevity sufficient to permit these associates to pursue the enterprise's purpose. As we succinctly put it in Turkette, an association-in-fact enterprise is "a group of persons associated together for a common purpose of engaging in a course of conduct. 452 U. S., at 583."

H. Defendant UNITED STATES and its co-conspirator defendants have and do meet these three tests in *Turkette* (as described at subparagraph G above), as they have and do initiate, construct, and sustain an associated-in-fact enterprise in a pattern of racketeering acts fraudulently concealed from the Lead Plaintiff and other plaintiffs of this class as follows:

(i) Purpose – the perpetuation of the development of the illegal BRMT bioweapon and bioweapon delivery system (18 U.S.C. § 175) over the past at least fifty-six years, the perpetuation of involuntary servitude (18 U.S.C. § 1584) to illegally benefit defendant UNITED STATES domestic and international spying operations, to benefit other police powers illegal operations (42 U.S.C. §§ 1981-1986, 1994) against the Lead Plaintiff and others, and to sustain a long-running cover-up (18 U.S.C. §§ 1512, 1513) and to evade political, financial, and other consequences from its exposure related to any financial damages and/or budget cuts which would result from its full and complete public disclosure.

(ii) Relationships – exist and persist among those associated with the enterprise, including police powers operations with both formal and informal relationships, with and among press, entertainment, political, and moneyed interests and groups which have consistent and persistent formal and informal relationships across time, which have and do pursue prejudicial and discriminatory acts, violations, and injuries against the Lead Plaintiff and other plaintiffs similarly situated.

(iii) Longevity – more than 56 years of corrupt systematic violations of constitutional rights and patterns of racketeering acts in interstate commerce, and to perpetuate illegal development of the BRMT bioweapon and bioweapon system in violation of both US and international treaties ratified by Congress.

I. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time. While all claims herein are directly related to the same set

of illegal programs prohibited under 18 U.S.C. §§ 1961-1968, in particular the underlying original focus and purpose of the entire associated-in-fact enterprise 18 U.S.C. § 175, directly applicable subcount paragraphs among paragraphs 600-794, which particularly relate to associated-in-fact patterns of racketeering acts, violations, and injuries to this claim for relief, are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	Facts - Subcount Series	Subcount(s)
600-603	NSEC National Security Pretexting and Entanglements	1-4
604-620	HEXP Illegal Human Experimentation	1-17
621-627, 629, 631-637	RGTS Individual Rights Violations and Conspiracies	1-7, 9, 11-17
639-693	RICO Racketeering	1-55
694-710	LTHL Lethality Attempts	1-17

853. CLAIMS FOR RELIEF - COUNT 53

Violations of Constitutional Rights Under the First, Fourth, Fifth, Eighth, Ninth, Thirteenth, Fourteenth Amendments

Defamation

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	28 U.S.C. § 2679(b)(2)
Washington:	RCW §§ 4.04.010, Common law defamation per se
New Jersey:	NJ Stat §§ 2C:14-9, 10:6-2, Common law defamation per se
New York:	Common law defamation per se
California:	NA
Massachusetts:	Common law defamation per se
Arizona:	NA
Texas:	NA
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph. as well as state statutes in all originating locations, many

of which are unknown at the time of this Complaint and will be available upon discovery. Lead Plaintiff was unable to locate any state statutory references for defamation during legal research so this claim is presented under common law, though technical hacking by defendant UNITED STATES can and has been broadly used to conceal information from the Lead Plaintiff as described in paragraph 635, 636 RGTS-15, 16. Any such state statutory rights are reserved hereby.

B. Defendants have and do plan, conspire, perpetrate and engage in their series of acts to defame, libel, slander, and misrepresent the Lead Plaintiff by, among other acts, injuries, and violations at the final subparagraph in this paragraph, both within and without the territory of the United States. Absent knowledge of the identities of the perpetrators of these acts it was impossible for the Lead Plaintiff to bring these matters to this court due to the extensive and durable pattern of fraudulent concealments by these defendants. The actual institutional and individual identifications of these defendants (paragraph 99 and LPEE 12251-12261) were not possible until June 2022 as to ARPAIO (paragraph 99a), as to various defendant FBI and ARMY personnel until Summer 2023, of GARLAND (as Mandich) until January 2024 and possibly in another role in March 2024 (as plausibly Bettesworth), and of MODDERMAN and GIA until February 2024.

C. As defined at 28 U.S. C. § 4101:

> "The term "defamation" means any action or other proceeding for defamation, libel, slander, or similar claim alleging that forms of speech are false, have caused damage to reputation or emotional distress, have presented any person in a false light, or have resulted in criticism, dishonor, or condemnation of any person."

A. Under the Westfall Act Federal Tort Claims

Procedure 28 USC § 2680 Exemptions (emphasis added):

> "The provisions of this chapter and section 1346(b) of this title shall not apply to (the following tort claims) —

> (h) Any claim arising out of assault, battery, false imprisonment, false arrest, malicious prosecution, abuse of process, *libel, slander, misrepresentation, deceit, or interference with contract rights*:
>
> Provided, That, with regard to acts or omissions of investigative or law enforcement officers of the United States Government, the provisions of this chapter and section 1346(b) of this title shall apply to any claim arising, on or after the date of the enactment of this proviso, out of assault, battery, false imprisonment, false arrest, abuse of process, or malicious prosecution. For the purpose of this subsection, "investigative or law enforcement officer" means any officer of the United States who is empowered by law to execute searches, to seize evidence, or to make arrests for violations of Federal law."

E. This action is brought under state laws for defamation, not under the Westfall Act, as the pattern of acts which comprise the false light and slanderous public narratives ascribed to the Lead Plaintiff related to terrorism, pedophilia, and the highly visible and publicized public acts of sabotage conducted by others who are most probably related to these defendants, as has been well documented by Congress in defendants' past pattern of practices perpetrated in defendant FBI's Cointelpro and defendant CIA's MKUltra. False narratives comprise the principal defamations by defendants UNITED STATES, ROSENBERG, FAUCI, and other as yet unknown individual and institutional defendants, who were not identified until the aforementioned dates but which began and spread from 2002 forward across Washington state, Massachusetts, and New Jersey during defendants' most coercive psychological operations and most aggressive illegal BRMT bioweapon and bioweapon delivery system hijackings through torture to suicide ideations, through their aggressive financial wrecking process, and human trafficking process, and other acts, violations, and injuries. These false and slanderous narratives, and their publications of acts intended to be private acts as public acts, were used to deflect attention from their criminal acts and injuries for the specific purpose of shielding themselves from blame and to blame their victim for their own associated-in-fact enterprise pattern of racketeering and other corrupt and illegal acts comprising:

(i) illegal human medical experiments without consent using the predecessor devices to the illegal BRMT bioweapon and bioweapon delivery system beginning in 1968 on the Lead Plaintiff as a 12 year old minor child and subsequent illegal medical experiments, entrapment and homicide attempts related herein, through and including the 1987-1988 destruction of his first marriage to Lynne, who was twice the ex-wife of a King County Sheriff's Department employee who reported directly to defendant REICHERT, followed by the orchestrated assignment of a fraudulently inculpated and orchestrated spouse Jeanette by defendants ARMY, CIA, DOJ, FBI, USMS, US Attorney for Western Washington, ROSENBERG, BURNS, WATERS, all under the close supervision of defendants of defendants FBI, USMS, and CIA personnel who supervised and directed this orchestration of Jeanette into Lead Plaintiff's personal and professional life, MUELLER (as FBI Director from 2001-2013), and unknown others.

(ii) a broad sweep of rights violations in employment and personal affairs and an associated-in-fact pattern of racketeering acts against Lead Plaintiff's businesses,

(iii) illegal human medical experiments without consent using the illegal BRMT bioweapon and bioweapon delivery system in 2002-2005 to torture to the point of suicide ideation in Kirkland, WA, to

(iv) a fraudulent terror narrative constructed there and perpetuated through trafficking to Boston for a Mossad interview, thence to northern New Jersey for

(v) police powers and illegal BRMT biomedical abuses orchestrated by defendant ROSENBERG using Joint Terror Task Forces in New Jersey and New York City, thence again

(vi) after terminated from ESTABLISH supervised by ROSENBERG for another round of torture,

(vii) followed by kidnapping into a Bergen County, NJ hospital from false imprisonment allegedly as a mental patient but actually for duress to secure the dismissal of a federal civil rights complaint while the federal court took no action to serve or dismiss the complaint for over 150 days, which service it is required to timely effect under 28 U.S.C. § 1915, thence

(viii) trafficked into a Ramsy, NJ residence where no employment was permitted as police powers entrapment attempts proliferated and where illegal BRMT bioweapon and bioweapon delivery system oxytocin manipulations were used to orchestrate a fraudulent onlinf relationship and steal funds, phone equipment and a game console to steal money from the Lead Plaintiff, thence

(ix) trafficked into another national security public corruption matter in Edgewater, NJ, all for the inculpatory convenience of defendants DOJ, FBI, CIA, ARMY, NJSP, BERGEN SHERIFF,

all of which is hopelessly intertwined with defendant UNITED STATES and its co-conspirator and cooperating police powers decades long durable pattern of violations of constitutional rights by these same defendants, and which cannot be separated from their overall pattern of acts, violations, and injuries concealed by this false light and slander. All of which were orchestrated in full public view, then unknown to Lead Plaintiff, for the purposes of slandering and damaging his reputation. Claims and actions against governmental officials as individual defendants for *libel, slander, misrepresentation, deceit, or interference with contract rights* are explicitly permitted to proceed under other federal and state statutes, as at 28 USC §2679(b)(2), which also provides for claims against current and former governmental officials as individual defendants for these defendnats' violations of constitutional rights:

"2679(b)(2) Government Officials' Individual Liability For Constitutional Rights Violations, All Statutes

(b)(1) The remedy against the United States provided by sections 1346(b) and 2672 of this title for injury or loss of property, or personal injury or death arising or resulting from the negligent or wrongful act or omission of any employee of the Government while acting within the scope of his office or employment is exclusive of any other civil action or proceeding for money damages by reason of the same subject matter .....

(b)(2) Paragraph (1) does not extend or apply to a civil action against an employee of the Government—
(A) which is brought for a violation of the Constitution of the United States, or
(B) which is brought for a violation of a statute of the United States under which such action against an individual is otherwise authorized."

Defendants' Defamatory Purpose And Intent

F. These defamatory acts were and are all intended, together with other entrapments described herein, to (i) conceal defendants' long-running corrupt and criminal public conduct which has and does use taxpayer funds and public debt to sustain the illegal BRMT bioweapon and bioweapon delivery system developed using Lead Plaintiff and others from this religious group and other unknown plaintiffs, as defendants' illegal human subject biomedical experiment victims over decades, and to (ii) conceal their associated-in-fact enterprise pattern of racketeering acts, and their rights violations against, among other plaintiffs, the Lead Plaintiff since he was first human trafficked by defendant UNITED STATES at age 12 from his family of origin, who have, and among whom some still do, practice a Quaker-based pacifist religious faith.

G. Even despite the awarding of the Medal of Honor to an unarmed Quaker ARMY cavalry bugler during the Civil War (William John Brewer, who is Lead Plaintiff's great-great, grandfather), defendant UNITED STATES has and does discriminate against this same religious family and religion, into which the Lead Plaintiff was born and is a fourth generation descendant

of that unarmed freer of slaves (his great-great grandfather Wiiliam John Brewer), based upon specific religious discrimination against those pacifist beliefs of his family including, without limitation, his father and uncle while in military service to defendant ARMY. This targeting by defendant UNITED STATES did and continued subsequent to military service as defendant UNITED STATES, its departments and agencies have and do continue to target them and their posterity for religious discrimination and color of law associated-in-fact racketeering acts and abuses of rights perpetrated by, without limitation, defendant UNITED STATES (DOJ, FBI, USMS, ARMY, and CIA) and its co-conspirator defendants, including individual defendants known and unknown. As defendant UNITED STATES has continued this discrimination, it has attempted numerous and repeated entrapments against these same plaintiffs including for the explicit purpose of defaming them to "blame the victim" and to deliberately misdirect the public away from these defendants' criminal acts against these plaintiffs.

Defamation - Criminal Entrapment Attempts Used To Construct Defamatory Legends

H. In furtherance of illegal BRMT bioweapon and bioweapon delivery system development, testing, and deployment, illegal human subject biomedical and psychological experimentation and terrorization, torture, and theft, among other acts, injuries, and violations at the final subparagraph in this paragraph, both within and without the territory of the United States, defendant UNITED STATES has at all times since 1968 acted to injure the Lead Plaintiff and members of this class of plaintiffs by promulgating and disseminating defamatory and false information and hoaxes regarding the alleged conduct of Lead Plaintiff and others similarly situated, which has and does damage their public reputations as intended by defendant UNITED STATES to assist in its campaign and program to control them at all times through its pattern of racketeering acts to (i) reduce them to penury through peonage and forced labor, (ii) sustain

involuntary servitude, (iii) eliminate other employment options, (iv) destroy their enterprises, and (iv) to directly endanger these plaintiffs, and (v) to persuade others not to associate with them when such associations would not suit the corrupt and criminal purposes of defendant UNITED STATES in perpetuating these plaintiffs' peonage, involuntary servitude, forced labor, and other deliberate discriminations against unalienable rights, all in furtherance of defendant UNITED STATES and its co-conspirators' series of schemes, conspiracies, frauds, thefts, and deprivations to these plaintiffs, their families, personal relations and relationships, their careers, reputations, fortunes, and business interests, including closely held business entities, among other acts, injuries, and violations at the final subparagraph in this paragraph, both within and without the territory of the United States.

I. Certain of these false narratives which defame these plaintiffs have been and are constructed together with operation of the illegal BRMT bioweapon and bioweapon delivery system for entrapment attempts, wherein the illegal BRMT bioweapon and bioweapon delivery system is used to create biochemical emotional impulses by, without limitation, hijacking the Lead Plaintiff's free will and behaviors in corrupt attempts to shape entrapments and perpetrations of criminal acts by the Lead Plaintiff including, without limitation, the following examples of entrapments and false and defamatory narratives worthy of an corrupt secret police operation, all taken from recent years:

(i) Chapter 2—Aircraft And Motor Vehicles (18 U.S.C. §§ 31 – 40a) § 32. Destruction of aircraft or aircraft facilities - several illegal BRMT bioweapon brain hijacking prompts toward attempting in-flight door operations in as Lead Plaintiff was pursuing fraudulent sales leads during the 2002-2005 cash flow and income starve out (paragraph 673), wherein no action was taken by Lead Plaintiff to complete these door opening mental prompts by the illegal BRMT bioweapon and bioweapon delivery system,

(ii) Chapter 2—Aircraft And Motor Vehicles (18 U.S.C. §§ 31 – 40a) § 37. Violence at international airports – an FBI entrapment attempt at paragraph 693A-C, wherein defendant FBI and/or its co-conspirators attempted to create a violent outburst after a storm-truncated sleep period resulting from a flight delay at Kennedy Airport in New York City forced him to remain overnight due to a missed connection during his transit of Seattle-Tacoma International Airport, which they attempted by their substitution of an undercover officer who refused to deliver a breakfast check to Lead Plaintiff as he needed to depart the concourse restaurant for his early morning flight to visit a ranch property listed for sale in Lake County, Oregon during one of his many attempts to engage in and which affected interstate commerce.

(iii) Chapter 10—Biological Weapons (18 U.S.C. §§ 175 – 178) As actually used by defendant UNITED STATES against Lead Plaintiff through its illegal deployment of the BRMT bioweapon and bioweapon delivery system against Lead Plaintiff, but created, promulgated, and perpetuated as a legend and false public narrative against him by its surreptitious creation and publication of live video, and in its exploitations in public venues of Lead Plaintiff which specifically includes, without limitation, on August 26, 2023, while Lead Plaintiff was enroute to and from Washington, DC for a MLK memorial civil rights rally. Defendant co-conspirators PAPD, DC Metro, and NYPD (paragraph 615D, LPEE page 11931) each conducted emotionally disturbed persons (EDP) training session drills while he transited from the Port Authority (PAPD); then into DC Metro where he was unable to access the subway system, so he walked to and from the Lincoln Memorial (DC Metro) which held such a training session as he walked back to Union Station; then while walking from Penn Station back up Eighth Avenue in NYC (NYPD) to the Port Bus Terminal to return home through their jurisdictions. This

narrative was originally constructed by FBI and CIA (ROSENBERG, BURNS) in Kirkland, WA, then reprised in Cliffside Park, NJ and had been developed and used by defendant UNITED STATES and its co-conspirators as part of its pattern of defamation and persistent misdirection, to create and wrongfully convey a false public image of the Lead Plaintiff as an emotionally disturbed person, paragraphs 320b, e, 615D, 463-465, despite their years of direct interactions with the Lead Plaintiff, all for their own corrupt purposes.

(iv) Chapter 113b—Terrorism (18 U.S.C. §§ 2331 – 2339d) As actually perpetrated by UNITED STATES (FBI, CIA, ROSENBERG, unknown others) and/or its co-conspirators against Lead Plaintiff and other innocent persons as misdirection to promote and perpetuate a fictional legend regarding Lead Plaintiff, paragraphs 11, 451, 516-519, 521, 603T-U, 604F.

(v) 42 U.S.C. Division A - Atomic Energy Subchapter XVII - Enforcement § 2284(b):

> "Unauthorized use or tampering with facilities, etc. Any person who knowingly causes an interruption of normal operation of any such facility through the unauthorized use of or tampering with the machinery, components, or controls of any such facility, or attempts or conspires to do such an act..."

As actually perpetrated by UNITED STATES and its co-conspirators against Lead Plaintiff, and promoted as specific misdirection to create, promote, and perpetuate this fictional legend regarding Lead Plaintiff, paragraph 602 NSEC-3.

Defamation – Using Surreptitious Public Sexualization And Sexual Humiliation

J. Among other falsely created legends in service of defendant UNITED STATES and its co-conspirators have been unfounded allegations spread by and in service of myths about sexual deviancy, pedophilia, terrorism, murder, misogyny, and other heinous acts and false allegations regarding Lead Plaintiff. Prior to defendant UNITED STATES' decision (primarily defendants

FBI, CIA, ROSENBERG, BURNS, unknown others in their own self-interest) to raise these false allegations about Lead plaintiff which they knew would attract potential lethal threats from the public and from other defendants herein, through their program of malicious misdirection, Lead Plaintiff had by then unwittingly spent hundreds of thousands of hours over decades (i) religiously communing under false pretenses with fraudulent church elder BREYER, paragraphs 99D, 211, 803C-H), (ii) living with PAGE, paragraphs 419, 492, (iii) then living with Jeanette, paragraphs 440-444, 610 HEXP-7, and others and (iv) working with these same institutional and individual defendants for more than three decades, (paragraphs 601-604 NSEC-1-4), all from at least 1970 to 2002, and (v) then again through 2008 in MA (the Dorchester homeless shelter federal security detail) and (vi) New Jersey at defendant ESTABLISH with defendant ROSENBERG (who had personally known, the Lead Plaintiff for mor than 25 years, while operating under two false cover identities not known to Lead Plaintiff), and others named at paragraphs 465-467.

K. While perpetrating this defamatory pattern against the Lead Plaintiff, defendant UNITED STATES (ROSENBERG) and other police powers, press, media, and entertainment defendants, and other defendants, acted to defame Lead Plaintiff by (a) a bogusly pretexted Mossad interview in greater Boston (paragraphs 464, 603B) intended to cement the terror legend shortly before his trafficking to NYC, (b) years of female officer honey entrapment attempts run in the NYC region both online and in field operations by various police powers operations (paragraph 504, 505), (c) the NYPD/FBI fraudulent terror investigation, probably from 2002 (FBI, ROSENBERG) which was carried forward into NYC in 2007 (paragraphs 464, 519, 555, 560, Interline Exhibits 17-18, 603B, F, G, L, 634C, 802B, 841), followed by defendants' attempted cover-up in September 2021, which is illustrative of the effort, energy, and taxpayer resources which defendant UNITED STATES (FBI, USMS, CIA) has put into this massive

defamation campaign and these public hoax narratives from 2002 forward, (d) the use of police powers personnel children during volunteer work with a falsified police powers variant of New York Cares (paragraph 526), among myriad other defamatory acts, hoaxes, and threats which carried on for years.

Defamation - Sensationalized Direct Sexual Abuse In Fraudulent Relationships

L. Defendant DOJ, FBI, USMS, and CIA, other unknown police powers and press, media, and entertainment defendants, and the individual officials and persons therein, in their deliberate, knowing, and willful election to engage in slander, smear, libel, and interfere with the rights of Lead Plaintiff in orchestrating fraudulent relationships have and do use both public venues such as the Beach Café in Kirkland, WA, and MATCH GROUP and HINGE websites either administered for their benefit or spoofed by them, to arrange these fraudulent relationships between Lead Plaintiff and (a) two not currently identifiable women due to Lead Plaintiff's current lack of access to his own records currently under defendant UNITED STATES' control, (b) MODDERMAN in 2008 paragraph 611 HEXP-8, and (c) GIA in 2019-2020, paragraph 613 HEXP-10.

M. Defendant UNITED STATES orchestrated, publicized, and sensationalized sexual acts intended by Lead Plaintiff to be private acts, without his knowledge or consent for their own prurient, corrupt, slanderous, and defamatory interests in concealing the facts of their illegal operations by "blaming the victim" as any criminal organization would do, by damaging his reputation even as it engaged in continued human trafficking in (i) the Kirkland, WA in 2005, where these acts were videographed in the 149th Street residence (directly across 149th Street from the residence previously occupied by BURNS, CIA) from the unoccupied adjacent rear property line residence (which had been fire damaged previously and was extremely slow to be rehabilitated), and the government tricked out residences (USMS) in (ii) Cliffside Park, NJ

where the MODDERMAN related acts occurred, including the now known to be publicly and permanently internet available sex scenes from 2008 with MODDERMAN (paragraph 611), who was presented on Match.com to Lead Plaintiff as the doting mother of three children by defendant FBI (ROSENBERG using that MATCH GROUP website, but actually adult film actor and later Trump hush money recipient defendant Stephanie Clifford, related to their fraudulent 2006 relationship, and (iii) the current Edgewater, NJ apartment using a federal Section 8 voucher administered by the State of New Jersey, where the related acts intended to be private with GIA occurred.

N. In addition to the defamation and sensationalization of publicly available videography, defendants added elements of public sexual humiliation. All three videographed episodes of sensationalized sexual acts (Kirkland, Cliffside Park, Edgewater) also included specific efforts to sexually humiliate the Lead Plaintiff using the illegal BRMT bioweapon and bioweapon delivery system through sexual abuse using the illegal BRMT bioweapon and bioweapon delivery system for brain hijacking of the central nervous system to induce erectile dysfunction (ED). Each of these ED episodes (paragraph 611 HEXP-5) was part of an orchestrated conspiracy between defendant UNITED STATES and these female participants so these events would occur in locations in the residences where surreptitious videography was possible. The specific ED symptoms experienced progressed over time from on/off ED in 2005-2008 to completely variable fine tuning of ED to various degrees during these incidents in 2020-2021, as the illegal BRMT bioweapon and bioweapon delivery system's capability to manage fine muscle control progressed from binary (similar to an on/off light switch) to totally variable and rapidly reversible (similar to operation of a dimmer light switch).

O. This sexual abuse, also at paragraph 823, and its publicly available videography were intended to publicly humiliate, smear, slander, and defame Lead Plaintiff as an element of these

defendants' criminal intent and conspiracy to construct a defamatory narrative about Lead Plaintiff, to misdirect the public, and to prevent him from pursuing his own interests which have and do contradict defendants' corrupt narrative.

P. Among about two dozen fraudulent dates between 2019 and 2021 used in constructing the overall defamatory narrative was a May 5, 2021 at Junior's Restaurant, NYC, where surreptitious videography of the Lead Plaintiff and an orchestrated date was recorded using a 35mm camera and telescopic lens from the exterior sidewalk the night before Junior's official post-pandemic reopening was announced by NY Senator Schumer. Documentary evidence of this orchestrated supposedly private date was deleted from the Lead Plaintiff's old out of service phone by defendant UNITED STATES in February 2024 to attempt to conceal the event, as described at paragraph 228.

Other Defamations In Greater New York City Region

Q. Defendants also created other false allegations against Lead Plaintiff including, without limitation, of pedophilia which they attempted to act out by (i) using the children of police powers personnel posing as homeless children who went on faked volunteer outings with New York Cares; (ii) psychological operations conducted using the illegal BRMT bioweapon and bioweapon delivery system (paragraphs 526), all while having full knowledge of his actual conduct as described at paragraph 841, which was intended to create false public impressions of the Lead Plaintiff; (iii) with sex traps and female officers who preceded him on his walks in New York City, and on buses, subways, and trains for the purpose of creating and sustaining false narratives intended to slander, libel and defame the Lead Plaintiff as a sexual predator. (iv) while they have and do interfere with contract rights with dating sites and public venues for this purpose (paragraphs 505, 608 HEXP-5); (v) a terror narrative sustained for years (paragraphs 464, 519, 555, 560, Interline Exhibits 17-18, 603B, F, G, L, 634C, 802B, 841), for the purposes

of endangerment, libel, and slander of Lead Plaintiff; (vi) have systematically misdirected public narratives and public opinion, and deliberately misdirected the actions of co-conspirator defendants for example, (vii) by falsely communicating to him the site of the Pentagon 9/11/2005 memorial service in media reports so Lead Plaintiff could not attend in 2005, and (viii) myriad other repeated and patterned abuses of rights in his attempts to participate in public assemblies, memorials; (ix) and in other public events; as described at paragraph 526, at Interline Exhibit 16, at paragraph 844B(ii), and systematic misdirection documented at LPEEV65-5.

R. These defamatory acts were and are all misdirection specifically intended to benefit defendant UNITED STATES' through its own slander, libel, misrepresentation, deceit, interferences with contract rights, and other myriad acts, violations, and injuries of Lead Plaintiff's rights, as described in all sections of this complaint.

Fraudulent Concealment And Willful Blindness Support Construction Of A Long-Running Slanderous And Defamatory Narrative From 2002

S. These slanderous and defamatory acts against rights and reputation are both grave and dangerous to personal well-being and health, which is the reason that defamation is subject to sanctions under law. Congress prescribed the same criminal penalties to punish and deter rights violations as for non-violent bank robbery (10 year maximum sentences), and for human trafficking as for violent bank robberies (20 year maximum sentences). But these crimes by federal police powers officials are never prosecuted by U.S. Attorneys, because they serve the corrupt and criminal interests of defendant UNITED STATES' departments, agencies, and of individual political appointees, officers, agents, and employees, who are or would be liable as individual defendants for these acts, violations, and injuries, even as they are perpetrated by those same defendants including, without limitation, defendant UNITED STATES, its departments and agencies, its own officials, officers, and agents (paragraphs 308, 320) against

US persons. Civil litigants, such as these plaintiffs, are reduced by this endemically corrupt failure to enforce the laws, to using state defamation laws to combat criminal acts undertaken by the federal executive branch against them.

T. These defamatory acts, together with other pattern rights violations and crimes, are deliberately directed toward members of this pious Quaker-based religious group and their posterity, and are entirely consistent with prior patterns of practice, illegal conduct which is well documented in the findings of the Senate Select Committee in 1975 and the Rockefeller Commission in 1977 (LPEE pages 237-271, 6885-7466), the findings of the Senate Intelligence Committee in 2014 (paragraphs 336-340), the repeated findings of the FISA Court in 45 years of scofflaw conduct related to FISA Act violations, and in 15 years of Section 702 rights violations documented by Congress.

U. Defendant UNITED STATES, in particular defendants FBI, USMS, and CIA, and their co-conspirator defendants, intended to create a false narrative and to sensationalize that narrative about the Lead Plaintiff in their direct interferences with the rights and reputation of Lead Plaintiff. Among other acts, injuries, and violations at the final subparagraph in this paragraph, both within and without the territory of the United States, these acts, violations, and injuries are the "worthy work" of any depraved secret police operation intent on destroying the reputation of its involuntary servant in an attempt to preserve its own corrupt interests in fraudulently concealing more than fifty-six years of police powers depravity and corruption.

Defendants' Durable Pattern Of Fraudulently Concealed Systematized Defamation

V. The systematic and durable program of fraudulently concealed defamation described herein, all then unknown to Lead Plaintiff, but well known to defendant UNITED STATES (FBI, ROSENBERG, CIA, BURNS, other unknown) and to myriad other defendants in press, media, and entertainment, and to still other as yet known defendants, whose culpability will be exposed

through the discovery process, is a necessarily limited set of examples of the wide variety of the public reaction and endangerment which has and does result from the false, defamatory, and slanderous fraudulently disinformation, misinformation, and hoaxes used in this mythical narrative creation and public propaganda campaign by these defendants.

W. Statutory civil recovery for defamation under color of law is permitted against defendant UNITED STATES, individual former and current officers and employees including, without limitation, ROSENBERG, BURNS, MELBER, RUBIN, VINDMAN, and others not presently known, for their acts, violations, and injuries in creating false, slanderous, and defamatory narratives, hoaxes, fictional legends, entrapments and public endangerment through their abuse of process, for the defamatory purposes of "libel, slander, misrepresentation, deceit, or interference with contract rights" (28 USC §§ 2679(b)(2), 2680, 4101) of the Lead Plaintiff and of other similarly situated, as it is under state statutes against other defendants herein.

X. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein and will (ii) provide further evidence from these defendants; and (iii) among defendants who presented, without limitation, (a) as families, (b) as members of the Lead Plaintiff's own extended family by marriage, (c) as fraudulent members of the family religion and its beliefs and practices, and/or (d) as "personal friend" individual defendants; all of whom were directly and individually involved in these violations of constitutional rights and laws, will provide further evidence from their then minor children who had no stake in creating or sustaining these illegal acts, violations, and injuries while considered as nephews, nieces, and

friends children which those individual defendants entrusted to the temporary care of Lead Plaintiff for varying periods of time.

854. CLAIMS FOR RELIEF - COUNT 54

Violations of Constitutional Rights Under the First, Ninth, Fourteenth Amendments

Freedom of Information

Defendants identified at paragraph 799 have and/or do violate the following statutes:	
United States Code:	5 U.S.C. § 552
Washington:	NA
New Jersey:	NA
New York:	New York Pub Off L. §§ 84-90
California:	NA
Massachusetts:	NA
Arizona:	NA
Texas:	NA
Maryland:	NA

A. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs. Defendants identified at paragraph 799, together with other unknown defendants to be identified through the discovery process have and do act in violation of federal and state statutes listed above in this paragraph. as well as state statutes in all originating locations, many of which are unknown at the time of this Complaint and will be available upon discovery,

B. Defendants have and do plan, conspire, perpetrate and engage in their series of acts to violate public information laws in the above named jurisdictions, as described at paragraphs 25, 298, 318, 320i, 571, 602D NSEC-3, 636 RGTS-16, Interline Exhibits 17-18, LPEE pages 508-541.

C. These acts and injuries are representative of those perpetrated by defendants on this class of plaintiffs, which also include other acts of violence, fraud, and continued willful blindness and fraudulent concealment directed at several generations of Lead Plaintiff's extended family, to this religious group, and to other as yet unknown plaintiffs perpetrated by defendant

UNITED STATES and its co-conspirators. Discovery will (i) provide evidence of further violations not described herein. Applicable subcount paragraphs which particularly relate frauds and other specific currently known acts, violations, and injuries to this claim for relief are the following, which together comprise a representative sampling of the full scope of such violations to this class of plaintiffs:

Paragraph(s)	**Facts - Subcount Series**	**Subcount(s)**
	NSEC National Security Pretexting and Entanglements	
	HEXP Illegal Human Experimentation	
636	RGTS Individual Rights Violations and Conspiracies	16
	RICO Racketeering	
	LTHL Lethality Attempts	

855. Paragraphs 855 through 898 are reserved.

END OF CLAIMS FOR RELIEF

* * *

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CONSTITUTIONAL AND STATUTORY REMEDIES FOR CLAIMS

893. Defendant UNITED STATES, its departments and agencies, most particularly defendant DOJ and its agencies, including, without limitation, its current Attorney General GARLAND, (who has a direct personal conflict of interest in this specific matter as a prior employee of defendant DOJ and/or its agencies which began in the 1970s when he interacted directly with at least the Lead Plaintiff and most probably others of this class, paragraphs 5, 21, 99d, 99m, 417-421, 490-493, 600G, 600L, 608C, 801N, 833F, 840C, 841N, 845E, 848C, have and do repeatedly, and in willful blindness, (paragraphs 25-30, 550-584) abuse their positions to evade both the institutional accountability of defendant UNITED STATES, its departments, and agencies, and their own direct individual culpability and liability for corrupt, extra-legal, and unconstitutional acts, violations, and injuries against these plaintiffs, and against these US persons' "unalienable rights," and have and do abuse color of law assertions of "state secret" privilege to place defendants' institutional and personal self-interest above "unalienable rights."

894. Since illegal highly classified programs, including this specific illegal BRMT bioweapon and bioweapon delivery system program (felony violation of 18 U.S.C. § 175, which is also classed as a RICO crime under 18 U.S.C. 1961(1)(B)), are briefed to senior members of Congress as the political leaders of the only two political parties of practical import in establishing federal policies through legislation, just as legal highly classified programs are briefed to those same political leaders, senior members of Congress have and do at times place partisan and personal political interests above their sworn constitutional interests.

895. This leaves no place other than the Article III Courts, which constitutionally were and are intended as the place of last resort for US persons to pursue justice, even in the face of invalid assertions of state secret privilege over "unalienable" individual rights. Since eighty-eight percent of jurists also originate as former employees and officials of the executive branch,

particularly within defendant DOJ, some may have concealed conflicts of interest in sustaining the secrecy of a long-running illegal program which has been illegally operated as a "state secret" program. This Court must consider those realities.

896. When Courts refuse, as the final refuge of justice for unalienable rights, to hear in civil complaints what defendant DOJ defends as "state secret" privilege and refuses to criminally pursue, what Congress in the self-interest of certain political leaders of both pollical parties will not hear, and courts themselves then systematically decline to hear, consider, and remedy these offenses against unalienable rights, there is no practical Constitution, nor is there any "unalienable right" in practice for plaintiffs so aggrieved. Their "unalienable" rights have simply vanished into the thin classified air of state secret privilege abused for the political convenience of a corrupt executive, which classification scheme and specific program classification are themselves defined and asserted under color of law by self-interested institutions and individuals who have direct inherent conflicts of interest.

897. When state secret privilege triumphs over unalienable rights, this triumph of privilege over rights is the unconstitutional perversion of a government created for the explicitly declared purpose "……that to secure these rights, governments are instituted among men," and of the Constitution itself, whose six paramount purposes expressed in its Preamble include "to form a more perfect Union, establish justice,….., and secure the blessings of liberty……"

898. This leaves US persons and our "unalienable" rights in a constitutionally untenable position. This cannot constitutionally stand, else we have no Constitution at all, merely pretty parchment wrought in meaningless gesture by the blood of many who have fought and died to obtain and sustain liberty for individuals over tyrannical institutions. The Courts cannot countenance this abused and contorted argument the privilege triumphs over individual liberty, else they themselves are no final refuge of justice, the very purpose for which they are

constitutionally established. Rather they become the last refuge of self-interested institutions, and corrupt institutional interests and individual officials who are placed in those positions for the explicit purpose of faithfully executing our Constitution and securing our rights.

899. For each count asserted in this Complaint, each plaintiff is entitled to injunctive relief, compensatory and statutory damages, and punitive damages, in addition to reasonable attorneys' fees and costs, from each of these institutional and individual defendants for physical and emotional injuries, loss of income, assets, and property, and other injuries incurred as the direct and indirect causal effect of the actions and failures to act of defendants. The table below summarizes the forms of remedies available for each claim by each type of defendant to indicate the scope of remedies available by federal statute and case law. Additional state statutory remedies are available to this Court as well.

Table 899A - Scope Of Remedies Available Under Constitution, Federal Statutes, Common Law

Title 5 Government Organization And Employees U.S.C. §§ Short Title
§ 301 Administrative Procedure Compliance With Statutes: "The head of an Executive department or military department may prescribe regulations for the government of his department, the conduct of its employees, the distribution and performance of its business, and the custody, use, and preservation of its records, papers, and property. This section does not authorize withholding information from the public or limiting the availability of records to the public."
Title 28 Judiciary And Judicial Procedure U.S.C. §§ Short Title
§ 2679(b)(2) Government Officials' Individual Liability For Constitutional Rights Violations, All Statutes "(b)(1) The remedy against the United States provided by sections 1346(b) and 2672 of this title for injury or loss of property, or personal injury or death arising or resulting from the negligent or wrongful act or omission of any employee of the Government while acting within the scope of his office or employment is exclusive of any other civil action or proceeding for money damages by reason of the same subject matter ……. (b)(2) Paragraph (1) does not extend or apply to a civil action against an employee of the Government— (A) which is brought for a violation of the Constitution of the United States, or

(B) which is brought for a violation of a statute of the United States under which such action against an individual is otherwise authorized."

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Title 18 Crimes And Criminal Procedure U.S.C. §§ Short Title

Chapter 77 Peonage, Slavery, And Trafficking In Persons

§§ 1581-1590 violations, including peonage, involuntary servitude, slavery, forced labor, and human trafficking - § 1593 requires mandatory restitution, § 1595 permits civil actions, and § 1595A permits injunctive relief.

§1593(a) "Notwithstanding section 3663 or 3663A, and in addition to any other civil or criminal penalties authorized by law, the court shall order restitution for any offense under this chapter.

(b)

(1) The order of restitution under this section shall direct the defendant to pay the victim (through the appropriate court mechanism) the full amount of the victim's losses, as determined by the court under paragraph (3) of this subsection.

(2) An order of restitution under this section shall be issued and enforced in accordance with section 3664 in the same manner as an order under section 3663A.

(3) As used in this subsection, the term "full amount of the victim's losses" has the same meaning as provided in section 2259(c)(2) and shall in addition include the greater of the gross income or value to the defendant of the victim's services or labor or the value of the victim's labor as guaranteed under the minimum wage and overtime guarantees of the Fair Labor Standards Act (29 U.S.C. 201 et seq.).

(4) The forfeiture of property under this subsection shall be governed by the provisions of section 413 (other than subsection (d) of such section) of the Controlled Substances Act (21 U.S.C. 853)."

Chapter 96 Racketeering Influenced And Corrupt Organizations (RICO Act) - Congressional Intent PL 91-452 October 1970:

"(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."

Chapter 96 Racketeering Influenced And Corrupt Organizations - Racketeering Acts Civil Remedies

1964(a): "(a)The district courts of the United States shall have jurisdiction to prevent and restrain violations of section 1962 of this chapter by issuing appropriate orders, including, but not limited to: ordering any person to divest himself of any interest, direct or indirect, in any enterprise; imposing reasonable restrictions on the future activities or investments of any person, including, but not limited to, prohibiting any person from engaging in the same type of endeavor as the enterprise engaged in, the activities of which affect interstate or foreign commerce; or ordering dissolution or reorganization of any enterprise, making due provision for the rights of innocent persons."

"1964(c): (c)Any person injured in his business or property by reason of a violation of section 1962 of this chapter may sue therefor in any appropriate United States district court and shall recover threefold the damages he sustains and the cost of the suit, including a reasonable attorney's fee……" inclusive of all violations defined at § 1961, including of acts of terrorism defined at 2332b(g)(5)(B)

§ 1962 Racketeering Acts Under § 1030 Computer Fraud "1030(g) Any person who suffers damage or loss by reason of a violation of this section may maintain a civil action against the violator to obtain compensatory damages and injunctive relief or other equitable relief……."

These § 1964 remedies apply to the following sections of U.S.C. Title 18:

1961-1968 Racketeering Influenced Corrupt Organizations	1343 Wire Fraud	1590 Trafficking – Forced Labor, Peonage, Involuntary Servitude
175 Biological Weapons	1512 Obstruction - Tampering	1951 Racketeering Threats Violence
1111 Murder	1513 Obstruction - Retaliating	1952 Racketeering Travel
1112 Manslaughter	1581 Peonage	1957 Racketeering Thefts
1113 Attempted Murder Or Manslaughter	1584 Involuntary Servitude	
1341 Mail Fraud	1589 Forced Labor	
Racketeering Acts under 18 U.S.C. § 1961, are inclusive of 2332b(g)(5)(B) Terrorism, under		
844(i) Arson In Interstate Commerce	1992 Terrorist Attacks on Rail, Air, Mass Transit	2332b Transcending national boundaries, within and without United States
956(a)(1) relating to conspiracy to murder, kidnap, or maim persons abroad	2332 Homicides and other violence against United States nationals occurring outside of the United States	2339 Terrorism, Harboring Concealing, Material Support, Financing
1030(a)(1), 1030(a)(5)(A) Protection of computers	2332a Weapons of mass destruction	2340A Torture

Chapter 113B § 2333 Terrorism, Civil Remedies (emphasis added)
"2333 (a) Action and Jurisdiction.— Any national of the United States injured in his or her person, property, or business by reason of an act of international terrorism, or his or her estate, survivors, or heirs, may sue therefor in any appropriate district court of the United States and shall recover threefold the damages he or she sustains and the cost of the suit, including attorney's fees."

"2337 Terrorism, Official Capacity Exempted – "No action shall be maintained under section 2333 of this title against— (1) the United States, an agency of the United States, or an officer or employee of the United States or any agency thereof acting **within** his or her official capacity or under color of legal authority……." noting that 5 U.S.C. § 301 mandates regulations must comply with law (paragraph 260).

These § 2333 remedies apply to the following sections of U.S.C. Title 18:		
844(i) Arson In Interstate Commerce	1992 Terrorist Attacks on Rail, Air, Mass Transit	2332b Transcending national boundaries, within and without United States
956(a)(1) relating to conspiracy to murder, kidnap, or maim persons abroad	2332 Homicides and other violence against United States nationals occurring outside of the United States	2339 Terrorism, Harboring Concealing, Material Support, Financing
1030(a)(1), 1030(a)(5)(A) Protection of computers	2332a Weapons of mass destruction	2340A Torture

Civil Remedies For Constitutional Claims – All Persons, Including, Without Limitation, Federal Officials When Acting In Conspiracy With Others Under Color Of Law

42 U.S.C. § 1983 Civil Action For Deprivation Of Rights - "Every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia, subjects, or causes to be subjected, any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, suit in equity, or other proper proceeding for redress….."

42 U.S.C. § 1986 Civil Action For Neglect to Prevent – "Every person who, having knowledge that any of the wrongs conspired to be done, and mentioned in section 1985 of this title, are about to be committed, and having power to prevent or aid in preventing the commission of the same, neglects or refuses so to do, if such wrongful act be committed, shall be liable to the party injured, or his legal representatives, for all damages caused by such wrongful act, which such person by reasonable diligence could have prevented; and such damages may be recovered in an action on the case; and any number of persons guilty of such wrongful neglect or refusal may be joined as defendants in the action;…."

Title 18 Chapter 46 Forfeiture § 987 Anti-terror forfeitures of property rights claims are permitted under any and all of 18 U.S.C. §§ 983, 987, Constitution, 5 U.S.C. Chapter 5 Administrative Procedure, all allowing at minimum compensatory damages and costs, and/or restoration of property, damages, and costs

These various remedies apply to all constitutional claims including, without limitation, the following sections of U.S.C. Title 18:

981-987 Forfeiture	1119 Foreign Murder Of US Nationals	1385 Posse Comitatus
1037 Email Fraud – track down stat ref	1349 Wire Fraud – Attempt And Conspiracy	1905 Disclosing Confidential Information
1038 False Information And Hoaxes	1365 Tampering With Consumer Products	

Title 42 Chapter 21 Civil Rights U.S.C. §§ Short Title

Chapter 21 Civil Rights Remedies
1983 "Every person who ….. subjects, or causes to be subjected, any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights,

privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, suit in equity, or other proper proceeding for redress…."

1986 "Every person who, having knowledge that any of the wrongs conspired to be done, and mentioned in section 1985 of this title, are about to be committed, and having power to prevent or aid in preventing the commission of the same, neglects or refuses so to do, if such wrongful act be committed, shall be liable to the party injured……"

These remedies apply to the following sections of U.S.C. Title 42:

1981 Equal Protection	1985 Conspiracy Against Rights	2000a Equal Access to Public Accommodations
1982 Property Rights Of Citizens	1994 Peonage Abolished	

Title 42 Chapter 21A Privacy Protection U.S.C. §§ Short Title

Chapter 21A Privacy Protection Remedies
2000aa-6 (a) Right of action
A person aggrieved by a search for or seizure of materials in violation of this chapter shall have a civil cause of action for damages for such search or seizure

These remedies apply to the following section of U.S.C. Title 42:
2000aa - Searches and seizures

Title 42 Chapter 21B Religious Freedom Restoration U.S.C. §§ Short Title

Chapter 21B Religious Freedom Restoration Remedies
2000bb-1(c) Judicial relief "A person whose religious exercise has been burdened in violation of this section may assert that violation as a claim or defense in a judicial proceeding and obtain appropriate relief against a government. Standing to assert a claim or defense under this section shall be governed by the general rules of standing under article III of the Constitution."

These remedies apply to the following section of U.S.C. Title 42:

2000bb Findings	2000bb-1 Free Exercise Of Religion Protected	

[Intentionally left blank.]

Table 899B – Scope of Remedies By Claim

Claims - Constitutional Rights, Statutory, and Common Law	Available Remedies By Claim			
	Injunctive Relief	Monetary Damages – Compensatory, Statutory	Monetary Damages – Punitive	Fees and Costs
801 Bioweapons and Bioweapons Delivery Systems Prohibited	X	X	X	X
802 Terrorism - Violent Crimes In Aid Of Racketeering Enterprises	X	X	X	X
803 Murder	X	X	X	X
804 Attempted Murder	X	X	X	X
805 Conspiracy To Murder	X	X	X	X
806 Manslaughter	X	X	X	X
807 Attempted Manslaughter	X	X	X	X
808 Kidnapping	X	X	X	X
809 Human Trafficking	X	X	X	X
810 Torture – Mental and Physical Abuse	X	X	X	X
811 Conspiracy to Torture	X	X	X	X
812 Assault	X	X	X	X
813 Aggravated Battery	X	X	X	X
814 Soliciting Crime Of Violence	X	X	X	X
815 Interference With Interstate Commerce By Threats Or Violence	X	X	X	X
816 Tampering With Witness	X	X	X	X
817 Tampering With Witness - Evidence	X	X	X	X
818 Retaliating Against Witness	X	X	X	X
819 Tampering With Consumer Products	X	X	X	X
820 Involuntary Servitude	X	X	X	X
821 Peonage	X	X	X	X
822 Forced Labor	X	X	X	X
823 Sexual Abuse	X	X	X	X
824 Frauds - Mail	X	X	X	X
825 Frauds – Wire	X	X	X	X
826 Frauds - Computer Access Devices	X	X	X	X
827 Fraud And Related Activity - Computers	X	X	X	X
828 Attempts And Conspiracy - Frauds By Mail, Wire, Computer	X	X	X	X
829 Scheme To Defraud of Honest Services - Mail, Wire, Computer	X	X	X	X
830 Property Rights and Illegal Takings	X	X	X	X
831 Racketeering - Monetary Benefit	X	X	X	X
832 Interstate And Foreign Travel Or Transportation For Racketeering Purposes	X	X	X	X

Claims - Constitutional Rights, Statutory, and Common Law	Available Remedies By Claim			
	Injunctive Relief	Monetary Damages – Compensatory, Statutory	Monetary Damages – Punitive	Fees and Costs
833 Civil Rights - Free Exercise Of Religion	X	X		X
834 Posse Comitatus - Use Of Military	X	X		X
835 Involuntary Servitude	X	X		X
836 Intentional Discrimination in Employment	X	X		X
837 Peonage	X	X		X
838 Conspiracy Against Rights	X	X		X
839 Deprivation of Rights	X	X		X
840 Deprivation of Rights Under Color of Law	X	X	X	X
841 Civil Rights - Deprivation of Rights Under Color of Law, Anti-Terrorist Forfeiture Protection	X	X	X	X
842 Deprivation of Rights Under Color of Law - Searches and Warrants	X	X	X	X
843 Searches Exceed Authority, Malicious Procurement, Without Warrant	X	X	X	X
844 False Information and Hoaxes	X	X		X
845 Neglect To Protect - Failure To Protect	X	X		X
846 Neglect To Protect - Failure To Supervise	X	X		X
847 Neglect To Protect - Failure To Train	X	X		X
848 Neglect To Protect - Misprison of Felony	X	X		X
849 Neglect To Protect - Acting as Accomplice	X	X		X
850 Neglect To Protect - Acting as Accessory	X	X		X
851 Neglect To Protect - Aiding and Abetting	X	X		X
852 Prohibited Activities - Pattern Of Racketeering Acts	X	X	X	X
853 Defamation	X	X		X
854 Freedom Of Information	X			

900. Lead Plaintiff, as representative of and behalf of the class of injured Plaintiffs, respectfully requests an award of the following relief described at paragraphs 901-916:

901. **Declaratory Judgment** that the actions described herein constitute violations of all federal and state statutes cited in this complaint.

902. **Order reversing conflict of law** that (i) the language in 18 U.S.C. 2340B:

> "...nor shall anything in this chapter be construed as creating any substantive or procedural right enforceable by law by any party in any civil proceeding"

which statutory provision violates our Constitution and the supremacy of the the ratified and adopted *Convention Against Torture and Other Cruel, Inhuman, or Degrading Treatment or Punishment,* Article 14.1:

> "Each State Party shall ensure in its legal system that the victim of an act of torture obtains redress and has an enforceable right to fair and adequate compensation, including the means for as full rehabilitation as possible. In the event of the death of the victim as a result of an act of torture, his dependents shall be entitled to compensation,"

and that (ii) 18 U.S.C. § 2340B is null and void as to that specific section from October 27, 1990, and may not be enforced from that date under the Constitution and laws of the United States, and that (iii) the Constitution and laws of the United States and the common law interests of equity require all such deprived plaintiffs in whatever action be so notified by defendant UNITED STATES within 90 days, and that (iv) the entire class of plaintiffs who are parties to this litigation be restored as near as possible for all injuries suffered throughout the development, deployment, and operation of defendant UNITED STATES' illegal BRMT bioweapon and bioweapon system.

903. **Emergency Order** providing immediate injunctive relief under (i) 42 U.S.C. § 1983 deprivation of rights, and under (ii) 18 U.S.C. § 1964, prohibiting defendant UNITED STATES' use of the 18 U.S.C. § 175 prohibited and illegal BRMT bioweapon and bioweapon delivery system per 18 U.S.C. 1961(1)(B), and (iii) for any and all other injuries as further defined, without limitation, at 18 U.S.C. §§ 1961-1968, and 42 U.S.C. Chapter 21, which Emergency Order thereby prohibits defendant UNITED STATES and any and all other known and unknown defendants who may possess or be able to access the illegal BRMT bioweapon and bioweapon delivery system, and any variant thereof, and including, without limitation, all their officers, agents, employees, contractors, and assigns, from engaging in all and every use of the illegal BRMT bioweapon and bioweapon delivery system technology, and which Emergency Order

declares the illegal BRMT (Brain Remote Management Technology) bioweapon, bioweapon delivery system, and any variant(s) thereof, as an immediate and continuing threat to life, health, and wellbeing, and to the human, civil, and Constitutional rights, of each and every plaintiff as a member of this class, to their families and communities, and to the general public, including any and all U.S. persons wherever they may be.

904. The Court is reminded that absent such an Emergency Order, the harms and injuries to this entire class of plaintiffs, to others as indirect victims, and to the public at large will continue, may very well escalate, and will lead to further injuries, including reasonably foreseeable deaths, disabilities, injuries, incarceration, and other readily foreseeable injuries, damage, and adverse consequences. Such consequences have already been experienced by Lead Plaintiff and other members of the class of plaintiffs for at least fifty-six years as defendant UNITED STATES' continuing and unaltered pattern of practice from prior illegal operations of predecessor programs including, without limitation, defendant CIA's MKUltra and defendant FBI's Cointelpro.

905. **Permanent Injunctive Order** prohibiting defendant UNITED STATES and any and all other known and unknown defendants who may possess or be able to access the illegal BRMT bioweapon, bioweapon delivery system, and any variant thereof, and including, without limitation, all their officers, agents, contractors, and assigns, and all other persons, from owning, possessing, controlling, operating, developing, using, licensing, or permitting any use of the illegal BRMT bioweapon and bioweapon delivery system, in any form or variant, for any purpose, against any US person or other innocent at any time and place. Further, that such Order:

(a) declare the illegal BRMT (Brain Remote Management Technology) bioweapon, bioweapon delivery system, and any variant(s) thereof has, does, and will pose an immediate and continuing threat to the life and health; and to the human, civil, and Constitutional rights;

(b) that the illegal BRMT bioweapon and bioweapon delivery system has and does violate that certain ratified international treaty having force of law in the United States of America, *Convention on the Prohibition of the Development, Production and Stockpiling of Bacteriological (Biological) and Toxin Weapons and on Their Destruction*,

(c) that the illegal BRMT bioweapon and bioweapon delivery system and is an instrument of domestic terrorism in violation of US law as defined at 18 U.S.C. § 2331(5), and is therefore subject to penalties under 18 U.S.C. § 2332(a) relating to illegal use under 18 U.S.C. § 175,

(d) require defendant UNITED STATES to use all feasible, ordinary, and extraordinary means and resources to protect and defend all US persons and other innocents from any such device, equipment, system, or operation, at any time and for all time,

(e) declare that the illegal BRMT bioweapon and bioweapon delivery system has been and is used as an instrument of torture by defendant UNITED STATES in violation of that certain treaty *Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment,*

(f) declare that defendant UNITED STATES has and does create and sustain an associated-in-fact enterprise which has and does engage in racketeering acts to fraudulently conceal (i) this pattern of racketeering acts by its own hands and those of known and unknown co-conspirators, and (ii) the illegal development and use of the illegal BRMT bioweapon and bioweapon delivery system on human subjects, and must immediately and for all time halt any such illegal medical experimentation, deployment, and abuse as to all persons without their knowledge and knowing consent, and that

(g) all future appropriations, funding, contracting, research, development, deployment and uses by defendant UNITED STATES and/or any other party, including any sovereign, for

the purposes of engaging in the development of the BRMT bioweapon and bioweapon delivery system, and in any racketeering acts for any purpose, are prohibited for all time.

906. The Court is reminded that absent such a permanent Order, defendant UNITED STATES will continue its historical pattern of serial violations in which it has continuously engaged since at least 1968, which abuse of US persons as subjects of illegal human subject medical experiments and as targets of an illegal bioweapon and bioweapon delivery system, has and does harm and injure the entire class of plaintiffs, still others as its indirect victims, the public at large, and has and does endanger national security in its internationally prohibited deployment and direct or indirect use against any person; and that defendant UNITED STATES, together with its co-conspirator defendants, may very well escalate these violations, injuries, and abuses, and cause and create further injuries, including, without limitation, death, disability, incarceration, racketeering acts, and other readily foreseeable adverse consequences, as such consequences have been experienced by Lead Plaintiff and other members of the class of plaintiffs for more than fifty-six years as relates to the illegal BRMT bioweapon and bioweapon delivery system, and as was experienced by direct and indirect victims in the immediate predecessor illegal programs of defendant UNITED STATES, CIA's MKUltra and FBI's Cointelpro, and their predecessor programs from at least the 1940s for which there were absolutely no criminal consequences of any kind at any time to any person, department, or agency for those massive and durable violations of criminal law by defendant UNITED STATES and its co-conspirators, which systemic failures of justice must be redressed in this matter by this court else it be repeated, functionally defeating ALL the unalienable rights of these plaintiffs while the Court would be facilitating the continuation of an extra-legal state of police powers impunity and color of law abuse of our Constitution by these defendants toward any US person(s) they may elect to target, pursue, and persecute without cause or due process under law.

907. **Order of Forfeiture** commanding defendant UNITED STATES to promptly and swiftly identify to the Court all direct and indirect victims of the illegal BRMT bioweapon and bioweapon delivery system, and to immediately restore any real, personal, or intangible property of any plaintiff, or if unavailable for restoration through intervening operation of law, to restore in equity and/or fairly compensate, including through all available statutory remedies, all which was proximately caused to be lost to these plaintiffs and/or to their businesses, estates, or kin as a result of the use of the illegal BRMT bioweapon and bioweapon system and its collateral, consequential, and indirect effects, and the pattern of racketeering acts of these defendants, whether or not directly or indirectly caused and created by defendant UNITED STATES, from the date of the commencement of the initial research on human subjects without consent (which dates at least from Summer 1968) to investigate, conceive, research, develop, and deploy the illegal BRMT bioweapon and bioweapon delivery system brain hijacking program from its most primitive early form to the present time, in accordance with the procedure described at 18 U.S.C. §§ 981 through 987, consistent with 18 U.S.C. § 1964, and with 18 U.S.C. §2333 as the prohibitions on such litigation at 18 U.S.C. § 2337 have and do violate those certain ratified international treaties having force of law in the United States of America, *Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment*, and *Convention on the Prohibition of the Development, Production and Stockpiling of Bacteriological (Biological) and Toxin Weapons and on Their Destruction,* and 42 U.S.C. §§ 1983, 1986 as these acts, violations, and injuries are elements of a conspiracy with state and local officials, and under other applicable federal, state, and common law.

908. **Monetary Damages** award in an amount to be determined by the jury, which amount cannot be properly identified at this time, which will fully compensate these plaintiff victims for injuries resulting directly and indirectly from the systematic abridgements and

violations of their constitutional, statutory and common law rights under federal and state law for the any and all uses of any generation of the illegal BRMT bioweapon and bioweapon delivery system, illegal human experimentation without consent, and the related associated-in-fact enterprise pattern of racketeering acts, throughout the defendants' approximately fifty-six year long pattern of color of law constitutional and statutory acts, violations, and injuries, and other criminal acts, violations, and injuries, misconduct, prejudicial operations, and neglect to prevent against the Lead Plaintiff and other plaintiffs of the class from at least Summer 1968 to the present. Lead Plaintiff is currently unable to identify and describe each and every specific violation and injury sustained over the past approximately fifty-six years, and has provided a representative sampling in the 110 subcounts at paragraphs 600-710, and in the claims at paragraphs 801-854, of the forms of criminal, civil, and treaty guaranteed compensable injuries which are representative, but not fully encompassing, of the extent and types of acts, violations, and injuries to plaintiff victims. Members of this class of plaintiffs have been victimized by (i) defendants' discrimination against their religious beliefs and practices, and (ii) through other forms of discrimination against them and their kin for multiple generations, by (iii) patterns' of racketeering acts, criminal acts, civil rights violations, treaty violations, coercive psychological manipulations, BRMT hijackings, and other injuries, and have and/or do experience from (a) as little as a few hours of illegal BRMT bioweapon and bioweapon system operations with unknown outcomes and injuries ranging to death, to (b) more than fifty-six years of continuously torturous injuries, including numerous attempted lethality events, such as (c) the past and continuing acts, violations, and injuries experienced directly by the Lead Plaintiff to date. Some plaintiffs of this class are doubtless heirs to deceased victims, and/or themselves permanently disabled, and/or themselves incarcerated, all as a result of these undiscovered remotely manipulated criminal act(s) perpetrated in fact by defendant UNITED STATES' use of the

illegal BRMT bioweapon and bioweapon delivery system against that particular plaintiff or to provoke that particular plaintiff to involuntarily and without so knowing, undertake a harmful act against a third party they would not otherwise have undertaken. All members of this class and their kin are entitled to full discovery of these crimes and injuries, and to justice including, without limitation, monetary damages. The monetary damages to be awarded will include some or all of the following:

909. **Compensatory damages for defendants' individual injuries to plaintiffs** - human, constitutional, civil, statutory, common law, and ratified treaty rights having force of law injuries in amounts to be determined by the jury at trial for injuries, whether by joint or several acts:

i. Torture, for each and every day of (a) torture and torture enhancement imposed by defendant UNITED STATES' operation of the illegal BRMT bioweapon and bioweapon system, and (b) torture and torture enhancement by the psychological operations of all defendants, however perpetrated;

ii. Daily suffering from torturous injury including, without limitation, the approximately 20,000 days experienced by Lead Plaintiff, and unknown numbers of days and injuries to other plaintiffs of this class, from (a) physical, mental, and psychological coercions and hijackings; from (b) public humiliations and threats; from (c) extreme fear, anxiety, and panic inducing damaging hyper-vigilance and other phobias and stress, and including post-traumatic stress disorder;

iii. Repeatedly induced biomedical abuses which have and do result in mental symptoms and illnesses, imposed by defendant UNITED STATES and its co-conspirator defendants, including, without limitation, (a) chronic anxiety, depression, phobias, fears, and suicide ideations from short cycle and long cycle

psychological coercion, provocations, and brain biochemical hacking, and (b) inducing both temporary and permanent biochemical damage to the brain, gut, and immune systems;

iv. Repeated physical illnesses, and symptoms of illnesses imposed through simulation of swelling and other physical manifestation, by defendant UNITED STATES including, without limitation, (a) repeated and extreme headaches of long duration in two cycles of approximately 100 to 300 days in Boston, MA and Cliffside Park, NJ; (b) heart irregularities and chest pains, (c) breathing irregularities, (d) vision irregularities, all with physical symptoms including, without limitation, pain to extreme levels, and inducing fears and phobias; (e) extreme physical pain in the torso, arms, legs, and head; (f) loss of control of bodily functions including, without limitation, life threatening acts against the Lead Plaintiff's own proper colon function in 2023-2024; and (g) induced allergic symptoms, requiring cost, expense of treatment, (h) stomach and digestive irregularities, (i) inducing needless emotional distress, to and including post-traumatic stress disorder;

v. Repeated daily coercion of psychological operations by defendants including, without limitation, those conducted using (a) hacked and spoofed websites, hacked home appliances, computers, printers, cell phones, and other electronic devices to induce and amplify stress, anxiety, anger, fear, and panic; (b) to engage and to amplify repeated cycles of hope, despair, fear, anger and reversal of those cycles, thereby magnifying psychological, physical, and biochemical changes, and (c) causing permanent irreparable damage to brain, gut, and immune system biochemistry, and (d) causing the necessity, inconvenience, and expense of

contacting fraudulently delivered and stressful fraudulently interposed services, intended to be provided by corporations which have been and are interposed by police powers personnel posing as customer service and support personnel by defendants in their corrupt intent to frustrate and provoke plaintiffs; and (e) the necessity, cost, inconvenience and expense of repairs, returns, loss of use, and replacements of property;

vi. Permanent health damage and disability imposed by defendants including, without limitation, those resulting from (a) medical misdiagnosis or malpractice by wrongfully modified biomedical test results and malfunctions through hacking of medical test and diagnostic equipment; (b) hormone suppression and magnification of appetite to induce rapid weight gain and adverse physical health changes; (c) organ malfunctions and simulated symptoms of organ malfunctions; and (d) short term memory blocking and loss; among others;

vii. Repeated physical and mental injury and lethality attempts and incidents, directed, orchestrated, and executed by defendants including, without limitation, (a) all forms of visual and verbal violent threats, (b) a wide variety of natural and accidental appearing induced injury and lethality attempts and cycles, including, without limitation, choking, tripping, falling, loss of balance, loss of consciousness; (c) purposeful distraction by visual illusions, color choices, and other psychological tricks, and by illegal BRMT bioweapon operations by defendants, leading to loss of concentration at points of risk and injury; (d) illegal BRMT directed and induced dangerous movements of plaintiff victims which can and do endanger them and bystanders, (e) plaintiff victim operation of vehicles and equipment under dangerous induced conditions, including, without limitation,

illegal BRMT bioweapon brain hijacking for momentary and longer periods of extreme sleepiness, extreme eye watering, rapidly induced vision distortions and headaches, and other injuries and temporary disabilities manifesting as allergic reactions;

viii. All these torturous injuries above have been and are created and/or aggravated by defendant UNITED STATES' illegal BRMT bioweapon and bioweapon delivery system brain hijacking to (a) magnify the adverse physical and psychological experience and injury to the plaintiff victim, and (b) to engage the plaintiff victim in high risk activities and conditions, and (c) to orchestrate these malign events and circumstances in environments where the action may result in injury, incarceration, or death to themselves or others from their involuntary acts perpetrated by the illegal BRMT bioweapon and bioweapon delivery system, and/or (d) from the acts of others who wrongly interpret the plaintiff victim's acts as voluntary and threatening, including, without limitation, by an armed agent or officer perceiving a lethal threat to themselves from a body movement or words which are in fact induced through illegal BRMT bioweapon brain hijacking;

ix. Involuntary servitude imposed by defendants including, without limitation, (a) partially compensated and uncompensated, unwitting, and involuntary employment and injury imposed upon plaintiff and/or aggravated or perpetuated by defendant UNITED STATES' through its conspiracy with other defendant(s), (b) forced labor and peonage, (c) various frauds, and/or (d) use of the illegal BRMT bioweapon and bioweapon delivery system to cause an act or failure to act which is apparently entirely a voluntary act or failure but is actually an illegal BRMT bioweapon and bioweapon delivery system hijacked and contrived

deviation from the plaintiff victim's own free will in a manner which is undiscernible to the plaintiff victim. Plaintiff injuries which have been, are, and will be experienced include, without limitation, partial and total loss of income, and unreimbursed costs from contractual thefts and malfeasance by defendants, due to (e) purposeful below-market compensation, (f) periods of planned unemployment facilitated by frauds and color of law abuses; (g) failure to fully compensate for materials, equipment, and services rendered; (h) deprivation of access to equal employment and career opportunities available to all other persons; (i) limits on and/or total elimination of business and entrepreneurship options, including (j) deprivation of rights to start, acquire, operate, and innovate freely and fairly in in-state, interstate, and international commerce. Involuntary servitude, forced labor, and peonage are distinct conditions which have been and are imposed by defendants, which status and conditions are not dependent upon the existence or lack of compensation or its specific amounts, as each exists if any conditions are imposed, including, without limitation, any and every threat, act, open or surreptitious coercion, or deliberate destitution of the plaintiff and/or other family or household members;

x. Forced labor and peonage injuries imposed by defendants including, without limitation, lack of fair market determined and fully paid compensation from defendants' deprivation of fair and equal access to employment opportunities, contractual rights, and to market established compensation, including by defendant entrapment, and retention for (a) plaintiff victim labor, services, and planned subsequent adverse termination and/or failure to fully compensate thefts; for (b) enhanced entrapment, incarceration and lethality risks; for (c) loss of

income, dividends, property and financial assets appreciation, and compound interest due to forced and contrived forfeitures; leading to (d) adverse income and employment outcomes, and to (e) programmed imposition of loss of creditworthiness and of access to non-usurious credit facilities; for (f) adverse imposition of and upon family, relationship, and financial choices and distress; for (g) frauds, and entrapment for adverse imposition of peonage; for (h) imposition of tax liabilities and penalties; for (i) color of law pretexting to falsely create suspicion, and by invoking imagined risks to state secrets and national security, including, without limitation, those which are deliberately created by the defendants to perpetuate their malign acts and conspiracy; for (j) the false imposition of international subject and terror classification designations, for (k) for human trafficking, kidnapping, and false imprisonment; (l) human trafficking for purposeful exposure to high risk and lethal domestic and international police powers environments; for (m) threat of destitution, for (n) realized destitution, for (o) homelessness, for (p) imposition of extreme risks and hardships on plaintiff victim and/or for (q) members of their families, including, without limitation, fear of and loss of liberty, health, and life, all at the direction, coercive manipulations, and/or hands and color of law lawless acts of these defendants;

xi. Loss of individual income and property, for each and every instance of injury, including, without limitation, predicate acts and frauds by defendants to force (a) disposal of personal, real, intangible property including, without limitation, real estate and financial assets and to force the forfeiture of normal appreciation of those assets, including, without limitation, by (b) the use of illegal BRMT bioweapon and bioweapon delivery system hijacking for biomanipulation of

oxytocin and other hormones and thoughts to create the circumstances of marital dissolution; (c) forced litigation expense and compromise of financial assets by acting in bad faith, by screening-in bad faith actors and screening out reliable customers, service providers, vendors, and relationships; (d) providing or screening-in dishonest services and service providers; using coerced service providers who act in their own self-interest to avoid personal consequences and penalties by functionally transferring those consequences to the plaintiff through their actions and failures to act, including, without limitation, illegally embedded legal counsel, legal counsel in criminal and/or civil difficulties manipulated into adverse actions or advice toward a targeted victim which police powers defendants are headhunting through this illegal color of law pattern of practice; (e) defendant injuries to plaintiff victims under color of law to evade accountability for prior acts or by perpetration of planned self-exculpatory acts to transfer culpability from the defendant to the innocent plaintiff victim, and/or (f) to evade accountability for defendants' self-inculpatory acts and injuries directed at plaintiff victim by using color of law abuses of other third parties; (g) defendant hacking of computers, cell phones, appliances, and electronic hacks and harassment, (h) thereby forcing losses of property and opportunity, and driving victim plaintiffs into extenuating circumstances used for incrimination and pretexting by creating financial, economic, relationship, and other personal difficulties, and (i) integrating illegal BRMT bioweapon hijackings and coercive psychological manipulations to add stress and to create conditions where the plaintiff victim is more likely to act out so that the acting out discredits or incriminates the plaintiff, and thereby the actual perpetrator defendant evades

responsibility, liability, and loss of reputation if their own patterns of malign, malicious, and physically or psychologically injurious acts, actions, injuries, and racketeering were to be publicly exposed; (j) destruction to complete loss of marital community and benefits therefrom including, without limitation, emotional, real, personal, and intangible property injuries; (k) purposeful exhaustion of benefits through frauds and deprivations to orchestrate forfeitures, destitution, and homelessness; (l) deprivations of benefits, programs, loans, and loan guarantees from federal, state, local, and private sector organizations; (m) forced litigation and compromise of bad debts and dishonest services of and by defendants exploiting police powers under color of law both through direct injury, and through the screening-in and screening-out of persons and entities to contrive particular outcomes; (n) negotiation of contractual penalties to reduce profits on future forced sales when a defendant has and does plan and contrive a forced forfeiture to occur at a future point;

xii. Virtual and physical incarceration of plaintiffs by defendants including, without limitation, each and every day of (o) involuntary servitude and entrapment by defendants for their own corrupt and self-interested purposes; (p) continuous subjugation to the illegal BRMT bioweapon and bioweapon delivery system for illegal human subject medical experiments, bioweapon targeting and brain hijacking by defendant UNITED STATES; (q) subjugation to other deliberate, pre-meditated, and coercive virtual restraints on liberty and rights in choices of activities and movements at all times of day and night; (r) all as aggravated by ongoing BRMT bioweapon and bioweapon delivery system induced torture, and by on-going psychological operations; (s) kidnapping into six months of false

imprisonment without due process of law of Lead Plaintiff conducted for duress in forcing the ostensibly voluntary dismissal of federal civil rights and racketeering litigation under duress to sustain defendants' continued fraudulent concealment;

xiii. Life and health injuries by defendants including, without limitation, those to (a) personal relationships, (b) mental and physical health, (c) freedom from fear of injury to health and well-being from defendants' police powers operations and interferences, (d) public defamation, notoriety, discrediting, humiliation, harm to reputation, and risks from public vigilantism, (e) manifested symptoms of physical disease and sicknesses, including, without limitation, mental illness, depression, anxiety, physical illness, extreme headaches, heart irregularities, breathing irregularities, vision irregularities, extreme pain in the torso, arms, legs, head; lethal threats, loss of control of bodily functions;

xiv. Liberty and free exercise of human, constitutional, civil, common law, contractual and other rights injured by defendants including, without limitation, (a) free pursuit of personal interests, activities, and avocations; (b) freedom of movement and travel; (c) unimpeded access to professional and career choices; (d) freedom from induced anxiety, stress, fear, and panic related to defendants' entrapment attempts and threats and attempts on life, business, career, and property; (e) freedom from fear, pain, anxiety, panic, and suffering from defendants' repeated forced forfeitures leading to homelessness, destitution, loss of personal relationships, (f) imposed threats on life from public vigilantism, loss of privacy and of personal space, (g) loss of liberty to form relationships freely and without fear of disruption and injury caused and created by defendants' ulterior motives

related to prejudicial police powers operations, political, and/or criminal intents and agendas;

xv. Pursuit of happiness injuries by defendants, including, without limitation, (a) feelings and reality of imposed isolation, (b) loss of companionship, community, and (c) trusted close emotional relationships and friendships imposed by defendants including, without limitation, the freedom to (d) enjoy family, leisure, hobbies, and interests; to (e) emotionally benefit from stable relationships and family, free of defendants' coercive manipulations of these plaintiff victim and/or other family members by illegal BRMT bioweapon and bioweapon delivery system hijackings, and deliberate brain, gut, and immune system disruptions, and ill health; (f) to travel and experience events, activities, culture, and the natural environment free from fear, concern, and vigilance for contrived accidents, adverse encounters, and entrapment attempts;

xvi. Civic participation rights and benefits lost to injuries by defendants including, without limitation, (a) free and private expression absent harassment and entrapment for personal religious and political beliefs, political speech, participation in civic life and organizations, as well as (b) trade and business organizations for personal and social enrichment and benefit;

xvii. All the torturous injuries above have been and are aggravated by illegal BRMT bioweapon and bioweapon delivery system brain hijacking used by defendant United States and its co-conspirators to (a) magnify these listed and other injuries and adverse emotional experiences of the plaintiff victim described herein, and to (b) further emotionally adversely engage the plaintiff victim while in high risk conditions and environments where their actions are (c) more likely to result in

injury, incarceration, or death from their own emotional state, (d) from illegal BRMT bioweapon and bioweapon delivery system hijacked involuntary acts, or (e) the acts of others who wrongly interpret the plaintiff victims' acts as voluntarily hostile and use force to injure or kill the plaintiff victim, including, without limitation, (f) an agent or officer perceiving a lethal threat to themselves from an involuntary body movement or from words induced by defendant UNITED STATES' illegal BRMT bioweapon and bioweapon delivery system brain hijacking to manipulate and control the plaintiff victim in that moment.

910. **Compensatory damages for defendants' injuries to business, commercial, and entrepreneurial property and rights** including, without limitation, a wide variety of (a) malign and illegal acts, some under color of law, (b) failures to act despite a sworn duty to do so, and (c) other adverse acts which have and do injure in-state, interstate, and international commerce, and (d) injure business income and prospects including, without limitation, loss of business and commercial reputation; (e) attempts on plaintiff victims' life(s) which damages the ability to freely travel and develop business and commercial interests; (f) illegally embedding personnel, sabotaging, hacking, and harassing plaintiffs and their commercial interests to develop and enhance plaintiffs' personal feelings of vulnerability, mistrust, and loss of freedom of movement and choice, thereby constraining plaintiff business, commercial, and entrepreneurial activities and (g) fraudulently replacing, limiting, or eliminating plaintiff business and commercial attractiveness to investors and to other equity and debt resources; (h) forcing litigation expenses and loss or compromise of legally due amounts and assets; (h) providing dishonest services directly or through screened-in bad actors and/or compromised companies, persons, and services; (i) sabotaging company operations and equipment using undercover police powers agents and operators; (j) posing as interested third parties to prejudice potential customers to the plaintiff by

engaging the customer in their entrapment efforts; (k) engaging, screening-in and promoting known third party bad actors; (l) loss of financial assets and appreciation of same; (m) forcing litigation and providing dishonest services by exploiting police powers under color of law both directly and through the screening-in and screening-out of persons and entities to manipulatively determine specific intended outcomes; (n) hacking and harassing to damage the business' ability to provide prompt services and products to customers; (o) anonymously disparaging business reputation; (p) engaging directly and through others in thefts of services; (q) creating and engaging directly and through others in business frauds including, without limitation, receivables thefts, bad check losses, forced asset compromises, defalcations, and thefts to reduce revenue, profits, and cash flow; (r) failing to provide, intervening to prevent, and/or providing fraudulent bid and performance bonds, and loan guarantees; (s) failing to provide, intervening to prevent, and/or providing fraudulent insurance and other financial products and services; (t) using fraudulent services and/or their intervention preventing or discouraging legitimate service providers to sustain their control of plaintiff and business cash flow, profits, sales opportunities and prospects and (u) to cause and create adverse financial outcomes to the plaintiff victim's business and personal income and future prospects; (v) reduce and/or eliminate through screening, hacking, spoofing, and other frauds the ability of the plaintiff victim and their business to form relationships freely and (w) without fear of ulterior motives related to prejudicial police powers operations, sabotage and entrapments; (x) deliberate overstaffing and costs created by departments, agencies, and persons acting in bad faith under color of law; (y) project delays, stoppages, and accelerations to increase labor and materials costs under color of law and/or coercion; (z) negotiation of contractual penalties which are normally rarely experienced as part of defendants' conspiracy to reduce profits on future forced sales when a

defendant planned and contrived forfeiture is forced on the plaintiff victim and/or their business occurs during a defendant planned and contrive future event.

911. **Compensatory damages for defendants' business, commercial, and entrepreneurial civic participation rights and benefits injuries** by defendants' predatory acts against rights and freedom including, without limitation, harassment and entrapment of plaintiff victim while participating in and benefiting from civic life and organizations, including, without limitation, trade and business organizations, to develop (i) business growth and expansion options through sales and revenue, (ii) projects, (iii) partnerships, (iv) acquisitions, (v) credit relationships, and (vi) other civic business and reputational benefits; civic participation in organizations including, without limitation, (a) religious, (b) political, (c) speech, (d) civic organizations, (d) trade and business organizations benefitting trade, business and commercial opportunities in in-state, interstate, and/or international commerce; all these injuries have been and are aggravated by the illegal BRMT bioweapon and bioweapon delivery system brain hijacking used by defendant UNITED STATES and its defendant co-conspirators to distort and to damage the emotional experience of the plaintiff victim, and to further emotionally engage the plaintiff victim while in high risk conditions and environments where their actions are more likely to result in (a) injury, (b) incarceration, or (c) death from their own involuntary acts or (d) the acts of others who wrongly interpret their acts as voluntary, including, without limitation, (e) another individual including, without limitation, a police powers officer or agent, or an individual in a weapons open-carry environment, perceiving a lethal threat to themselves from a body movement or words induced through illegal BRMT bioweapon and bioweapon delivery system brain hijacking.

912. **Additional statutory damages and remedies** as available to affected members of the class of plaintiffs, including, without limitation, those to be awarded in accordance with 18

U.S.C. §§ 981 through 987, 1514, 1514A, 1961-1968, 1595, 2333, 2441, 2520; 42 U.S.C. Chapters 21 and 21B generally, including §§ 1981 through 2000h-6, and particularly 42 U.S.C. §§ 1983, 1986, 2000a, 2000b-2, 2000d, 2000d-1 through 2000d-7, 2000-e2(a)(2); 42 USC §§ 2000bb-2000bb-4, and all other federal, state, and local statutory program protections, relief, and civil and criminal recoveries afforded to any or all plaintiff victims of the class so injured.

913. **Costs and damages** from loss of use, value, and appreciation of value due to all loss and/or forced sale of any and all property and property rights in tangible and intangible property; any and all transaction costs, fees, and expenses; accumulated appreciation; accumulated interest; all from the date of the injury, for all injuries.

914. **Punitive damages** against defendant UNITED STATES, against all governmental defendants including, without limitation, their agents, officers, employees, confidential informants, in their official capacity, and as individual defendants where so identified herein and/or through the discovery process, and any and all others acting with their knowledge or consent, or acting with privileged access not available to the general public including, without limitation, press, media and entertainment industry persons, for (i) color of law abuses of the "state secret" privilege under *United States v. Reynolds,* 345 U. S. 1, 12 (1953), which privilege defendants forfeited from the very first day of these violations and injuries; for (ii) bad faith abuses of "qualified immunity" under *Harlow v. Fitzgerald*, 457 U.S. 800 (1982) and related case law cited herein, whereby defendants forfeited any legally valid claim to such defense; (iii) under 18 U.S.C. §§ 1961-1968 and other relevant statues and treaties, for all compensable acts, violations, and injuries including, without limitation, for the constitutional violations by defendant UNITED STATES, its departments and agencies, and individual defendants who have and do act outside their scope of authority in acts, violations, and injuries in grave Common Article 3 injuries as defined at 18 U.S.C. §§ 2441(d), including 2441(d)(1)(a) Torture,

2441(d)(1)(b) Cruel or inhuman treatment, 2441(d)(1)(c) Performing biological experiments, 2441(d)(1)(d) Murder and attempted murder, 2441(d)(1)(f) Intentionally causing serious bodily injury, 2441(d)(1)(f) Sexual assault or abuse; all as committed in violation of ratified international treaties as cited at paragraph 251 herein and compensable under 18 U.S.C. §§ 1961-1968, and for (iv) other such damages and punitive damages as the Court may instruct, all in amounts to be determined by the jury at trial.

915. **Reasonable costs, expenses, and fees** including an award of reasonable attorneys' and experts' fees, and for expenses.

916. **Such other relief** as the Court deems necessary and just.

JURY DEMAND

917. Plaintiffs demand a jury trial on all issues so triable.

REQUEST FOR APPOINTMENT OF COUNSEL

918. Lead Plaintiff respectfully requests the appointment of counsel on behalf of the entire class of plaintiffs.

* * *

Dated:

Respectfully submitted,

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