

## **PARTIES**

### **I. Plaintiffs**

50. Dennis Sheldon Brewer, Lead Plaintiff, is an involuntary servant of defendant UNITED STATES' illegal BRMT bioweapon and bioweapon delivery system program, who was involuntarily enrolled in the illegal BRMT development and deployment without consent while a minor child at approximately age 12 in 1968. He was selected by defendants ARMY and CIA, with the covert support of defendants DOJ, FBI, and USMS, because he was child in an illegally targeted Quaker offshoot religious group whose father had served as a conscientious objector in defendant ARMY's Medical Corps. The illegal BRMT bioweapon and bioweapon delivery system program, an unimaginably intrusive program which biochemically hijacks the human brain, directly contravenes the very purpose for which the United States government was created, to secure "unalienable Rights." The illegal weapon program has and does use him as a human guinea pig, all fraudulently concealed from him from age 12, one of defendant UNITED STATES' direct human medical experiment abuse victims through brain biochemical torture to the point of suicide ideation on multiple occasions. Defendant UNITED STATES has developed BRMT's capabilities by hijacking the unwitting Lead Plaintiff's brain, and those of others in his family and beyond, for its illegal human experiments and sustained his on-going involuntarily servitude to defendant UNITED STATES, to and including numerous injuries and attempts on health and life by defendant UNITED STATES, as well as through a pattern of racketeering acts which it and other defendants have secretly repeatedly perpetrated over his entire adult life, destroying and orchestrating relationships to and including marriage, controlling the entirety of his career and employment, destroying multiple businesses and engaging in forced labor in still others, and created and sustained humiliating false public narratives while it engaged in acts of

domestic sabotage through its own acts and violence of others, as it did in MKUltra and Cointelpro between the 1950s and the 1970s. A personal statement and comprehensive profile of the Lead Plaintiff is provided at LPEE pages 140-236. Lead Plaintiff Dennis Brewer is a resident of Edgewater, New Jersey.

**Extreme Difficulty Of Detection - Lead Plaintiff's Injuries Are Representative Of Injuries To The Class Of Plaintiffs**

51. Defendant CIA's MKUltra, with active collaboration of defendant ARMY (Bioweapons Lab), illegally abused unwitting US persons with 100 million doses of LSD in a population of about 170 million, while it operated in secret for two decades. It was not well known even to members of defendant CIA outside the program itself during that entire period. Defendant FBI's illegal Cointelpro program similarly operated in secret for decades, and was only uncovered because of a citizen activist group burglary of files in a tiny FBI satellite field office in Media, PA. Both programs engaged in systematic patterns of criminal acts against US persons for which there were no legal consequences ever. Defendant CIA's MKUltra secretly ran over 140 illegal field operations, some lasting decades, and secretly illegally drugged US persons with 100 million doses of LSD into a US population of roughly 170 million people, spreading drug-related mayhem, injuries, and violence in particular targeted communities as well as in prisons, hospitals, and universities, and in brothels it owned and operated. During the same era, Cointelpro consumed about 30% of FBI field operations resources (defendant FBI had an approved internal headcount of approximately 20,000 people in 1975, plus an unknown number of paid informant infiltrators) for its surreptitious infiltrations, using interpersonal and organizational sabotage and manipulations, and violent acts which physically injured people, and which stole citizens' rights to peaceably assemble for lawful purposes. FBI infiltrated faith-based organizations like the Lead Plaintiff family's Quaker church which was infiltrated by BREYER

and a phony home-based congregation established, as well as community-based organizations which ran feeding, community empowerment, and community health programs, and supported other civil rights such as voting registration, as well as community-governance organizations such as farmer, wholesale, and consumer cooperatives later infiltrated by defendant WEISSMAN (Puget Consumers Cooperative) and ROSEBERG (NutraSource) with no legal basis for their infiltration. CIA's MKUltra was finally ended in 1973 and its injuries of US persons were illegally covered up with obstruction of justice by the federal government. FBI's Cointelpro ended in 1971, but comparable scofflaw violations continue today, such as (i) the above referenced illegal infiltrations lacking any legal foundation by BREYER, WEISSMAN, and ROSENBERG in the 1970s into the 1990s, (ii) 45 years of continuing violations of FISA warrants, and (iii) fifteen years of Section 702 violations by FBI, which rights violations continue at the present time according to Congressional investigations and the FISA Court. Defendants CIA and ARMY's illegal BRMT bioweapon and bioweapon delivery system and the accompanying defendant DOJ program of racketeering crimes against these plaintiffs have likewise been fraudulently concealed by obstructions of justice and color of law abuses of the "state secrets" privilege from the 1960s to the present time by defendant DOJ and other defendants through their corrupt obstructions of justice, including systematic destruction of evidence.

52. Illegal BRMT bioweapon and bioweapon delivery system neuroscientific and technological progress has continued in great secrecy since the 1960s, as scientific, medical, and technological research and development has progressed, eventually completely supplanting CIA and ARMY's failed MKUltra experiments to secure mind control in humans. The illegal BRMT bioweapon was first used against the unwitting human trafficked Lead Plaintiff by defendant

UNITED STATES in 1968 when he was age 12, by the following illegal artificial hijacking of his brain's biochemistry:

"The posterior pituitary gland secretes ADH and oxytocin hormones synthesized in the hypothalamus and are released into the neurohypophyseal capillaries that surround the gland. Antidiuretic hormone (ADH) is synthesized in the supraoptic nuclei of the hypothalamus, while oxytocin is synthesized in the paraventricular nuclei of the hypothalamus."

Source: National Institutes of Health

The illegal BRMT bioweapon has progressed from (i) a crude locally operated device used to hijack the free will of the Lead Plaintiff by overstimulating his brain's oxytocin hormone level to an extreme level in 1968 (paragraph 417), to (ii) a remotely triggered device in the 1980s (paragraph 694 LETHL-1), and to (iii) completely remote operational capabilities in the present time.

53. Advances in computing, communications, and precision location technologies, together with the evolving understanding of neuroscience, have been used to increase the operational capabilities of the illegal BRMT system over the past decades. Developments in this broad category of brain/computer interface devices, including relatively crude antilog devices, such as the medically beneficial Synchron device at paragraph 6 and LPEE pages 11-25, were deliberately and fraudulently concealed from Lead Plaintiff's active searches for knowledge by defendant UNITED STATES technology hacking of Lead Plaintiff's internet access from at least 2012 until 2021.

54. Since illegal BRMT brain hijacking technology is an unprecedented development in human history, and has operated in great secrecy since the 1960s, the illegal BRMT bioweapon and program caused injuries and patterns of injuries from both BRMT and the pattern of racketeering acts, violations, and injuries used in its development and deployment, which have injured other US persons in this class who would have no awareness of their injuries, nor any

reason to be even aware that the elaborately contrived naturally appearing events and consequences were in fact deliberate injuries perpetrated by defendant UNITED STATES and its co-conspirators. As described herein at paragraphs 359-399, and LPEE beginning at page 1, it is virtually impossible to detect the modern version of BRMT used in brain hijacking, since it uses very discretely addressed pulses of directed energy targeted to hijack and trigger completely normal natural brain functions remotely. Since the sensation of the moment seems completely normal, it is extremely improbable that injured members of this class would even be aware they were actively being hijacked.

### **Other Plaintiffs**

55. As with its direct lineal predecessor program, MKUltra, there is an extremely high probability the illegal BRMT bioweapon and bioweapon delivery system has been used to abuse many innocent US persons and others around the world over the past fifty-six or more years. The Lead Plaintiff's direct knowledge of likely BRMT brain hijacking victims includes only a very small number of the class of plaintiffs likely injured as a result of the actions of the defendants and their co-conspirators. The class of plaintiffs includes members of the Lead Plaintiffs extended family of origin and his two destroyed marital communities. Plaintiff class members very likely include members of the Lead Plaintiff's own family of origin, his two former spouses and their minor children (his former stepchildren), members of his extended family, as well as friends, former girlfriends, and others not identifiable at this time.

56. Other injured persons also likely include members of a broader class of the general public who have been and/or are presently directly injured US persons and/or have indirectly injured acts against relatives and others by these defendants. Plaintiffs and their rights have been injured in a wide variety of ways, or even incarcerated or killed, as a result of the actions of the

defendants and their co-conspirators. Since BRMT leaves no direct evidentiary traces for its victims or nearby witnesses, other forensic means will be required, including production of defendant UNITED STATES' computer and operator log records.

57. The identities and specific extent of injuries of virtually all members of the class of injured Plaintiffs is currently only known to those defendants directly responsible for the management and operation of the illegal BRMT bioweapon and bioweapon delivery system over the past five decades. Key reasons for this reality are (i) the extreme difficulty to detect the modern version of BRMT, (ii) a lack of public awareness due to the unique nature of the system, and (iii) the lack of transparency afforded by "state secrets" to defendant UNITED STATES. This lack of transparency is affirmed by acts as simple as CIA and ARMY refusals to comply with the legal requirements of the Freedom of Information Act and Privacy Act, which require them to acknowledge, and to act upon, information requests. Neither CIA nor ARMY has met even this minimal legal obligation to acknowledge Lead Plaintiff's requests (LPEE pages 387-412, 508-541). FBI coordinated a cover-up of events in the ROSENBERG human trafficking sequence with NYPD in September 2021 (Interline Exhibits 17 and 18), but NYPD had already let slip a key investigative detail in a September 3, 2021 email reply to Lead Plaintiff acknowledging the matter (Interline Exhibit 17).

#### **A. Mere Recognition Of BRMT Is Immensely Difficult For Victims**

58. The primary reasons the Lead Plaintiff was eventually able to unravel the illegal BRMT bioweapon and bioweapon delivery system and forensically reverse engineer the entire development sequence using his specialized knowledge and experience (see LPEE pages 140-236 for Lead Plaintiff's education and professional experience) is because of:

- A. Defendant UNITED STATES' repeated brain hijackings, some of which are literally impossible for the human mind to produce on its own, such as the multiple guillotine-like nerve activation sensations across the neck as a knife blade in August 2022 in the early stages of an accelerated frequency of physical lethality events between a July 2022 verbal threat and incidents of indirect physical violence from then until November 2022, described at paragraph 537(e), and other physical and verbal manipulations which were founded in brain hijackings of Lead Plaintiff using the illegal BRMT bioweapon and bioweapon delivery system described herein.
- B. Eventual recognition of the long cycle sequences of programmed adverse outcomes to Lead Plaintiff provided the insights needed to forensically reverse engineer the stages of BRMT's development, its increasing sophistication over the decades, and the associated-in-fact enterprise pattern of racketeering acts used to perpetuate his involuntary servitude to the illegal human biomedical experiments and extreme psychological coercion used in BRMT development, particularly in the destruction and orchestration of marital relationships by BURNS and after the 9/11/2001 terror attack while FAUCI ran the BRMT program, described herein.
- C. Defendant UNITED STATES field operations personnel in defendants CIA, FBI, USMS, ARMY and other agencies, functionally trained the Lead Plaintiff in common U.S. intelligence tradecraft methods without intending to do so. Field personnel also left tradecraft clues which led like breadcrumbs from the time he was in high school, such as his first 1972 glimpse of a satellite/cell phone in a brief case near Greenwater, WA; in 1979 at graduate school, "Keep in touch, I like to know famous people" a completely mystifying statement at the time by one of his college professors, Dr. Paul SHAFFER;

and as a 1980s consultant, “A physician invented a cure for which there was no disease, his assistant caught the cure and died,” by John Hagopian, National Community Banking Senior Manager at Deloitte Seattle, on the Federal Deposit Insurance Corporation project and Lead Plaintiff’s co-instructor for Bank Administration Institute strategic planning seminars.

- D. Key recollections as at C above, forensic recognition of then mysterious but distinctive pattern operational security backchecks run routinely to assess operational security across decades, and tradecraft “rhymes and riddles” such as FBI’s trademark “coincidences” with the Senator Menendez investigation (related at paragraph 301, 514, 524-525, 564, 599D(i)(h)) are now familiar to Lead Plaintiff. Combined with Lead Plaintiff’s unique range of experiences in (a) many kinds of government (legislative, executive, department, agency, bureau, office) and private sector operations (startups to global leaders), (b) his systems development and integration project experience, and (c) his relatively unusual combination of systems design, technology literacy, and science background, this unique experience and his “natural, unteachable ability to see around corners” (LPEE pages 191-192), were critical to his eventual insight that the illegal BRMT bioweapon was even scientifically possible as defendant UNITED STATES continued to carefully conceal all web-based knowledge of brain-computer interfaces in development (Synchron device now being tested under FDA approval, at paragraph 6 and LPEE pages 11-25) from his view until 2021. This analytical conclusion led in turn to his mind experiments, to an understanding of the methods used to fraudulently conceal BRMT, and to his further understanding of operant conditioning used in mental magnification of BRMT’s effects during extended coercive psychological field operations, and to a clear recognition of the



specific psychological triggers used both to make these associations and to conceal the true biochemical source - common brain hormones manipulated to evoke heightened feelings and emotions - which are actually being synthetically created in that moment by the illegal BRMT bioweapon's remote hijacking of brain biochemistry using precisely aimed pulsed energy sequences which target those glands and other addresses in various brain regions, from primitive (such as the fight or flight adrenaline hormone) to advanced (such as executive reasoning and speech center functions).

- E. Lead Plaintiff used a methodical process of hypothesis development, research, and experimental tests, widely known as the scientific method, to eventually understand BRMT. During Lead Plaintiff's own field experiments to firmly establish a direct correlation between his verbalizations and defendant UNITED STATES' actions, defendant UNITED STATES BRMT operators provided repeated direct responses in a predictable manner when it used the illegal BRMT system to specifically contradict a series of verbal and non-verbal thought experiments being run by the Lead Plaintiff. Lead Plaintiff's intent was to test repeatability to specific stimuli and to firmly establish the mechanism of activation to that these biochemical sensations were non-randomized artificially driven unnatural occurrences. Defendant UNITED STATES' own very sloppy tradecraft provided this repeatability and thus established the extremely strong correlation, a highly effective confirmation to the Lead Plaintiff which could only have been provided directly by the defendant UNITED STATES' BRMT operators. This set of thought experiments revealed the extent and scope of their illegal artificial dominance of free will through these brain biochemical hijackings.

F. This methodical approach, and the forensic reverse engineering which followed, is how the Lead Plaintiff came, with great difficulty, to understand and integrate his long chain of experiences and its wide ranging adverse impacts. Reverse forensic engineering of the technologies required to operate this illegal bioweapon system remotely directly led to understanding of the evolutions in neuroscience and technological systems exploited through research, development, test, and deployment of the illegal BRMT bioweapon and bioweapon delivery system since the 1960s. Then Lead Plaintiff researched the neuroscience basics of brain function to reverse engineer the series of system components required to implement the BRMT system for remote operation on a global scale. The illegal BRMT bioweapon and bioweapon delivery system is explained in summary beginning at LPEE page 1.

#### **B. Myriad Challenges To Identify Members Of The Class Of Injured Plaintiffs**

59. Most other plaintiffs in this class who are similarly situated would find it virtually impossible to detect BRMT hijacking intrusions. BRMT pulsed energy signals penetrate the skull in carefully dosed, timed, and aimed sequences to hijack the natural biochemistry of the brain at a specific address, so the specific nerve sensation, thought, word, or action feels completely normal to the BRMT victim. Since there is no need for the BRMT operator to be anywhere near the victim, the visual clues normally present with any normal police powers operation are simply not there. Neither the victim nor any bystander would be able to visually detect the illegal BRMT operation when it happens nor after a BRMT sequence is complete. There are simply no visual clues, only tiny undetected momentary energy pulses which disappear just as any radio signal does when it passes a location.

60. The BRMT signal sequence can be transmitted virtually anywhere in the world, originating from a remote supercomputing center, transiting a global constellation of satellites owned and managed by defendant UNITED STATES, and reaching the BRMT victim in about 0.3 seconds, the blink of an eye. No local trace of the BRMT hijacking remains since the tiny, directed energy pulses used as BRMT hijacking instructions are received and absorbed by the victim's brain, which uses the energy in the biochemical reaction which creates the thought, act, verbalization, etc.,.

61. It is also very difficult for US persons, educated from childhood to believe in the concepts of free will and liberty as guaranteed by our Constitution, to even conceive of such a monstrous program being conducted by defendant UNITED STATES against its own people - children, adults, families, anyone. But defendant UNITED STATES has done this to US persons before. As mentioned, ARMY and CIA pursued MKUltra, FBI pursued Cointelpro, which ran from the 1950s into the 1970s entirely in secret until discovered by a citizen activist burglary, press reports, Congressional hearings, and a Presidential Commission in the 1970s. Further, while laws were passed to reform these practices (and ignored by defendant DOJ and its police powers agencies), there were no criminal consequences to any of the executive branch participants in these illegal acts of violence and rights abuses against citizens. So, the practice has simply continued, and the laws written to reform these practices at the time continue to be ignored. BRMT and the accompanying racketeering program are the result of that continuing willful disregard of the rule of law by defendant UNITED STATES, primarily DOJ, FBI, USMS, CIA, ARMY and other military services.

62. Even if an unidentified member of the class of BRMT hijacked plaintiffs were able to understand it is possible for defendant UNITED STATES to conduct this kind of depraved abuse

against a US persons, they would still need many repetitions of BRMT induced behaviors which are well outside their normal range of behaviors to catch even a glimmer of this biological and behavioral hijacking by Defendant UNITED STATES. And their typical first instinct would naturally be to blame themselves, rather than any malicious intimate intervention.

63. This type of violence, the biochemical hijacking of the human brain, has never been experienced in the two million year history of human beings, much less at the hands of a supposedly democratic government, proclaiming itself to be the shining light of democracy to the world. It was simply impossible. So, why would a reasonable person even suspect it?

#### **C. Scale of Research, Development, and Deployment Expenditure Required Is Vital Clue to Likely Number Of BRMT Victims**

64. Accomplishing the current highly sophisticated stage of prohibited BRMT bioweapon development has been extremely expensive and daunting, probably requiring secret expenditures on a scale similar to developing the first nuclear weapons, or to engineering the first orbits of the earth by U.S. astronauts. It certainly took vastly more effort to develop BRMT in secret than it did to drug victims with 100 million purchased doses of LSD during MKUltra using a drug which had already been developed by a Swiss pharmaceutical company.

65. Both the federal government's malign history of abuses using MKUltra and Cointelpro on US persons, and the fifty-five year experience of the Lead Plaintiff which initially overlapped with both those programs into the 1970s, make it very highly probable that many other innocent people have been victimized and violated by Defendant UNITED STATES. This reality and the evidence presented here provide strong circumstantial evidence that these defendants' violations of human, civil, and Constitutional rights have been and likely continue to be on a large scale.

#### **D. Estimated Size of Plaintiff Class**

66. BRMT's total class of Plaintiff victims is currently known only to the federal government executives, managers, and operators hiding behind color of law abuse of the "state secret" privilege which cannot prevail under independent legal scrutiny of a prohibited program such as the illegal BRMT bioweapon and bioweapon delivery system. BRMT is a *prima facie* violation of 5 U.S.C. § 301 and *United States v. Reynolds*, 345 U. S. 1, 12 (1953) (paragraph 260) which requires all such programs, regulations, and acts comply with law (and with the Constitution's reservation of "unalienable" rights to US persons). To provide some context for the Lead Plaintiff's estimated range of Plaintiffs, we below consider defendant CIA's MKUltra and defendant FBI's Cointelpro programs, then attempt to estimate the likely range of potential plaintiffs in the class.

67. CIA's MKUltra directly impacted millions of people over twenty years (1953-1973). Though most records were destroyed by defendant CIA to obstruct justice and hide the program's injuries from the American people and Congress, the ten year CIA brothel drugging project alone likely involved well over 650,000 contacts. There were more than 140 other projects conducted under the MKUltra program umbrella while the 100 million LSD doses were administered by what was then likely the world's largest drug dealer, Defendant CIA's MKUltra, operated against US and Canadian citizens and soldiers as the total US population in that era grew from 155 million in 1953 to over 205 million in 1973.

68. Cointelpro was another program of comparable scale of defendant UNITED STATES. Defendant FBI, which is defendant DOJ's largest police powers agency, operated as a White Supremacist police powers organization against civil rights, and as a co-conspirator with and funder of violent far right radical extremists over 15 years (1956-1971) across the entire United States. It also funded and directed a violent far-right White Supremacist militia group.

While FBI's activities were focused most intensely on people like Dr. Martin Luther King, Junior, SNCC leader John Lewis, Malcolm X, and other prominent leaders and activists, its impacts were felt broadly in the Black community and among anti-war activists of the time.

69. The confidential files detailing Cointelpro's prime targets and measures to be taken were burgled by activists from a tiny two-person FBI office in Media, PA in March 1971, so the program was obviously very wide-spread across the United States. The Black population alone grew from about 16.5 million in 1956 to 23.6 million in 1972, though the impact was more widespread as Cointelpro's FBI agent and paid informant infiltrations, operations, and sabotage included acts against people of color, anti-war activists, alternative lifestyle advocates, and other "fringe" persons and groups who promoted ideas, notably including many now mainstream and well accepted concepts and rights. These "fringe" groups included many majority Whites such as non-mainstream Christian evangelicals, including Lead Plaintiff's grandparents who were openly surveilled by Defendant FBI (paragraph 404, 410-411), and other ethnicities.

70. To calculate the potential number of BRMT victims, we must consider (1) BRMT's more than fifty years of direct and indirect malign impacts ranging from lethal events to perversion of justice to systematic hijacking of free will for the benefit of another; (2) the extreme difficulty any US person or other innocent would have in detecting and confirming that their own brain is being biochemically hijacked by the BRMT bioweapon and bioweapon delivery system; (3) the incredible 3 quadrillion operations per second computing power of a single supercomputer installation – defendant UNITED STATES has dozens of supercomputer centers; and (4) the ability of defendant UNITED STATES communication, satellite, and precision location technologies to reach sub-pinpoint locations (likely ranging to as small as 5,000 nanometers or so in the brain, around the size of a single cell, in a human body which

typically has about 37 trillion cells), and to accomplish this task virtually anywhere on the globe, using a stream of BRMT biochemical hijacking instructions can which typically reach the intended victim within 0.3 seconds after transmission (about one short eyeblink).

71. Over the program's fifty-five plus years to date, it would have been possible to impact every single citizen of the United States for literally hours of BRMT hijacking over the course of each year, though the Lead Plaintiff is confident these acts and the related pattern of racketeering acts of Defendants were restricted to a select minority of the total population. Assuming the development cycle proceeded very slowly in the early stages (1970s and 1980s) and each new generation of the technology took two to three years to troubleshoot and to correct flaws in the BRMT bioweapon itself before field deployment using the BRMT bioweapon delivery system, it is likely the number of US persons who are injured direct Plaintiff victims is quite large.

72. This estimate relies on currently unverifiable assumptions due to the "state secrets" privilege and the complete blackout of communications of executive branch perpetrator departments and agencies with the Lead Plaintiff. The Court will need to compel defendant UNITED STATES to produce this information to determine the actual identities of the plaintiffs and the precise scope, duration, and extent of injuries to plaintiffs.

73. In the absence of such a remedy, the Constitution is itself, for all practical intents and purposes a moot document of no particular significance, as it is only a matter of funding and time, to deliver this illegal BRMT bioweapon by, for, and on behalf of defendant UNITED STATES to any and all US persons at any future point for any reason or no reason whatsoever based upon a presidential order or, simply, on any arbitrary bureaucratic whim, with no regard for due process. Our country's history informs this view - Cointelpro and MKUltra which

demonstrated the power of “state secrets” combined with functionally unimpeded bureaucratic or Presidential whim, in light of defendant DOJ’s willful blindness (paragraphs 550-583) and its long-standing unwillingness to criminally prosecute such violations.

74. Paragraphs 74 through 89 are reserved.

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## **II. Defendants**

90. This action is brought primarily against government officials as named herein, and their successors and assigns, all in their official capacities. The primary institutional perpetrators of the illegal BRMT biomedical and psychological operations experiments and deployment; rights violations; and racketeering acts, injuries, and violations, are the government departments and agencies which they supervise. Federal defendants named below, which may include as yet unidentified departments and agencies, are known collectively as defendant UNITED STATES in this Complaint, since they operate in secret, never identifying themselves. Due to this uncertainty, defendant UNITED STATES may appear in this Complaint identified as one of its departments or agencies even when actually operating in another department of agency as these roles are confused and overlapping, as well as conducted in secrecy. Plaintiffs identifications are made in good faith based upon patterns of practice but cannot be made absolutely due to this pattern of secrecy, so the burden of proof to the culpable party must be laid upon these defendants to assure equity in these proceedings. The misidentification of one agency or department for another by these plaintiffs as to any specific act nonetheless must resolve to plaintiffs' benefit to sustain equity and justice in these circumstances, as these acts, violations, and injuries have been and are perpetrated by these defendants' joint and several acts, violations, and injuries in their associated-in-fact enterprise and conspiracies to act, and in their neglect to prevent.

91. Most other police powers defendants in this litigation also operate undercover nearly all the time as well. Some non-governmental defendants are known and specifically identified. Several current and/or former federal officials are also named in their personal capacity as individual defendants, in accordance with personal liability for bad faith acts provided, without

limitation, by *Harlow v. Fitzgerald*, 457 U.S. 800 (1982) (paragraphs 272-273), by *Bivens v. Six Unknown Federal Narcotics Agents*, 403 U.S. 388 (1971) (paragraphs 277-299), and by the statutory provisions which expose them to direct individual liability for violations of constitutional rights, as provided at 28 U.S.C. § 2679(b)(2) (paragraph 267).

92. Defendants are clearly identified in the page caption to the extent possible in accordance with F. R. Civ. P. Rule 17, when identifications have not been defeated by defendant UNITED STATES' in-line hacking of addresses of certain individual defendants during complaint preparation as described above at paragraph A. Each specifically identifiable defendant participated in the overall conspiracy, their role is summarized herein, and their role, where they are readily identifiable, is also described in the Facts section narrative and 102 examples of acts, violations, and injuries cited therein. All defendants also have vicarious liability as co-conspirators for the acts and failures to act of other co-conspirators under federal and state laws related to rights, to racketeering, and to conspiracies, including under U.S.C. Title 18; and violations of constitutional and civil rights and conspiracies, including under U.S.C. Title 42, Chapter 21.

#### **A. Specific Technical And Tradecraft Challenges To Undercover Operational Identifications - Police Powers, Intelligence, and Media**

93. Defendant FBI, DOJ, and military services government officials who work in deep cover assignments have and do at times permanently disappear from view, even though the specific individual continues to live on after their undercover role is completed. Staged “deaths” are one common exit method used to extract personnel from deep cover roles and sustain operational secrecy and security for on-going espionage operations which can span decades.

94. New identities list “official” biographical ages, typically a decade or so younger, which will not correspond to the ages they would have been during their undercover roles,

thereby helping to obscure their true age and the former undercover identity. These biographical lies and, at times, medical plastic surgery, are elements of their “resurrections” from deep cover assignments to new identities and roles, both within and outside their respective departments and agencies.

95. These birthdate changes are tradecraft elements of background legends which have subsequently been built to minimize the possibility of an identity match (for example, by being too young based upon the “resurrected” birthdate to be an adult while you were an adult figure in a prior undercover life, the odds of an identity match across these two “lives” is reduced). This is a common technique for manufacturing new identities for deep cover operatives - but these defendants’ physical appearances are completely consistent with positive identifications and near normal aging, with the occasional bit of face tightening or other normal medical procedures used to modify appearance.

96. Some personnel have had their children directly involved in these roles as family members to sustain credible covers. This is a sure throughline which definitively identifies their past roles in this program, as those children were also directly involved in these operations as Lead Plaintiff’s young nieces and nephews from as young as 12 hours old to adult ages.

97. Both intelligence operations (police powers and intelligence agencies and departments at all levels of government), and media who have been directly involved in acts, violations, and injuries to members of this class through their patterns of racketeering acts, make common use of body doubles as well to mislead targets by conflating identities across these roles and by trading personnel.

98. While not generally publicly known, these tradecraft practices have been and are routinely used by various intelligence operations around the world, including by domestic police

powers and by international intelligence agencies and departments, to exit personnel from deep cover assignments related to various secret operations, including the ultra-secret and completely illegal BRMT bioweapon and bioweapon delivery system across the past six decades (Constitution, 18 USC § 175, and 1972 *Bioweapons Treaty*, among others), and to the pattern of rights violations and racketeering acts perpetrated to cover the illegal BRMT program and other illegal general search operations inside and outside the territory of the United States.

99. Rotations out of deep cover assignments to “normal” life from the illegal BRMT program among institutional defendants and named individual defendants in this action (LPEE pages 12251-12261) have included, without limitation:

- a. Joseph ARPAIO – MARICOPA SHERIFF, known as Greg Crossgrove. Identified June 2022.
- b. George BIVENS – known as John Steele at Alliance on Port of Seattle BCD Concourse project in the early 1990s, Lt. Col. George Bivens, Pennsylvania State Police, identified September 2023.
- c. Lloyd AUSTIN – ARMY, former name not recollected, during rotations through Boeing defense operations; then at CNA as an indirect report while ARMY in civilian dress; then as general officer; now SEC DEF. Identified September/October 2023.
- d. Stephen BREYER – formerly known as Jack Sackville-West, Spokane architect who “died” out of program executive role in Spokane; and went to SCOTUS; now retired. BREYER also posed as the presiding elder in the “Snow” home-based church in Kent, WA which was attended by Lead Plaintiff’s family of origin having been transferred away from its home congregation from 1963 forward to

1970 by that religious group's "preachers" (who were actually government infiltrators of the religious group if this pattern and the deliberate are established by corroboration) within a few weeks after the death of Lead Plaintiff's eleven year old sister, Sandra, in April 1970 from Reye Syndrome induced by a fatal overdose of aspirin blended with pain-killing codeine to give maximum lethality effect prescribed telephonically by family physician Dr. KOHLER, Federal Way, WA, (paragraphs 99d, 417, 418, 714, 740, 803C-D, 805B(i), H, S, BS, 806B, 814B). Identified September/October 2023.

- e. Leslie CALDWELL – Assistant US Attorney, fraudulently misrepresenting herself as a Seed & Berry intellectual property attorney in Seattle, WA in Spring 2004, who represented Allegent, LLC dba Performa in intellectual property claims in a direct ethical conflict of interest to fraudulently conceal FBI undercover operations against Allegent, LLC, using FBI's ShipNow cover company in the financial wrecking of Lead Plaintiff; later Assistant Attorney General - Criminal Division; later private practice; now retired. Identified September/October 2023.
- f. Ari MELBER - FBI, formerly known as Wes Lewis, who became the husband of Theresa Yarbrough half-sister to Jeanette (fraudulently orchestrated second wife of Lead Plaintiff), as an extended family member by marriage; later SDNY prosecutor; now network television media anchor. Identified September/October 2023.
- g. Charles ROSENBERG – FBI, formerly known as Chuck LeFevre, NutraSource CEO, as a CEO reporting to Lead plaintiff and to other FBI embed Board

members; then William Drumm ESTABLISH General Manager, as an employer, while actually a US Attorney; then FBI Chief of Staff, then Acting DEA Administrator, now law school professor, private practice, and network television media analyst. Identified September/October 2023.

- h. Lisa RUBIN - FBI, formerly known as Michelle Yarbrough, an extended family member by marriage with children in tow during operations; then Assistant US Attorney; now network television media analyst. Identified September/October 2023.
- i. Alexander and Yvgeney VINDMAN - ARMY, formerly known as Paul and Greg Yarbrough, extended family members by marriage in the fraudulently orchestrated marriage of Lead Plaintiff to Jeanette who was secretly an active duty soldier threatened with military prosecution to coerce the fraudulent marriage, both with children in tow during operations; now a book author and consultant, and a federal electoral office candidate, respectively. Identified September/October 2023.
- j. Andrew WEISSMAN – FBI, known as Lyle Whiteman, first at Associated Grocers, then at Puget Consumers Cooperative where Lead Plaintiff was on the Board of Trustees for three years in the early 1980s; then US Attorney; later FBI General Counsel; now law school professor and network television media analyst. WEISSMAN was identified September/October 2023.
- k. Michael WORTHY – FBI, who has distinctive red hair and mustache, who appeared as Brad last name not recollected, a grocery checker and stocking clerk at Larry’s Market where Lead Plaintiff worked in 1972-74, co-owned by Larry

Brewer (an extended family member) and by FBI through its illegal investment using an agent who posed as a store partner (and worked as produce manager for a time, name not recollected); then reappeared as Mike WORTHY (paragraphs 99k, 418, 422, 493, 726, 762 table, 770, 805AG, AK) at WSU during Lead Plaintiff's WSU MBA program, then in a background photo on MSNBC's MELBER (former FBI as undercover Wes Lewis in the 1990s and early 2000s) behind WEISSMAN (FBI) in 2023 (paragraph 422), believed to be a photo taken of a group of co-workers in the Eastern District of New York where WEISSMAN worked for a time and later presided as U.S. Attorney. Identified September/October 2023.

- l. Neal KATYAL – formerly known as Shawn Morrissey while posing as a student at the small carve-out high school attended by Lead Plaintiff; later DOJ Acting Solicitor General; now law school professor and network television media analyst. Identified September/October 2023.

m. Merrick GARLAND – while posing as student Robert Mandich in Perham Hall and the Nez Perce student apartments at Washington State University, Pullman, WA where he drove an older model green Mercury Capri with extensive door dings, while residing near the Lead Plaintiff during the 1974-1976 school years. Identified January 2024. GARLAND was plausibly also Stuart Bettsworth, a student at Lead Plaintiff's Decatur High School in 1971-1972, as identified in that role in March 2024.

Network media personalities have also played deep cover roles during the illegal BRMT, rights, and racketeering acts, violations, and injuries to Lead Plaintiff and other members of this class of plaintiffs including, without limitation:

- n. Bianna GOLODRYGA- unknown agency or other relationship, now press appearing on the CNN and PBS Amanpour Report television interview program, formerly known as Ruthanne Meyers, an accounting staff member who reported to STONE at LazerSoft, when Lead Plaintiff became employed there as CFO in 1986. GOLODRYGA left LazerSoft in late 1986 or early 1987.
- o. Thomas KEENE – while Bloomberg Media, formerly known as Michael Callahan, while posing as an investment banker at DOMINICK during a financing effort by Lead Plaintiff for his Winnett Perico, Inc. (Winnett) startup; network television anchor. Identified January 2024.

100. All these personnel underwent similar tradecraft transformations to rotate into and out of these assignments while sustaining a consistent operational appearance. Specific individuals have been and are rotated in or out of specific events or event sequences to sustain operational secrecy and obscure certain details, at times even from a highly visible public profile person who believes they are directly involved in each and every phase, and in each and every action, but are not always directly involved in or knowledgeable about certain events which transpire under their identity, but are conducted by a deep cover body double or by a deep cover person in their “sphere” or “entourage.”

101. Some of these operations are legally permissible. The operations described herein are a subset of the entire scope of both operations conducted and of Lead Plaintiff’s now much clearer knowledge of such operations and operational details. This litigation is focused



exclusively on unconstitutional and extra-legal conduct of these institutional and individual defendants against US persons who are entitled to the full protection of the Constitution and laws of the United States of America, regardless of any invalid claim of state secrets privilege to exculpate illegal and criminal acts (paragraph 260) and regardless of tacit institutional willful blindness to these defendants' illegal and criminal acts (paragraph 550-583).

#### **A1. Government Defendants Generally**

102. Generally speaking, and without limitation as to specific defendants, the overall illegal pattern of practice by these defendants incorporates the following acts, violations, and injuries, as federal statutory violations (state statutory violations are co-identified with each federal statutory violation where the relevant state domicile can be firmly established absent discovery):

- (i) Without limitation as to the identities of defendants within the federal executive branch, defendants CIA, ARMY, DOD, DARPA, NIAID, and DHHS have and do conduct illegal abusive human biomedical experiments to and including torture, coordinated indirect physical injuries, and lethality attempts, at times with co-conspirators including, without limitation, City of New York, NYPD, and other police powers departments and agencies, against the Lead Plaintiff using the BRMT bioweapon and bioweapon delivery system, which is prohibited under 18 U.S.C. § 175, 18 U.S.C. § 1385, and Title 42 Chapter 21 Civil Rights,
- (ii) Defendant FBI has and does pursue a pattern of racketeering offenses against the Lead Plaintiff including, without limitation, involuntary servitude, financial entrapments, deliberate entanglements in other investigative matters, forced labor, and human

trafficking, prohibited under 18 U.S.C. §§ 1961-1968 and Title 42 Chapter 21 Civil Rights,

- (iii) Defendant USMS has and does pursue a pattern of racketeering offenses against the Lead Plaintiff including involuntary servitude, deliberate entanglements in other investigative matters, also using embedded personnel to engage in negligent and purposeful violations of (a) safe food handling practices resulting in food borne illnesses, (b) proper medical care deprivations and distortion of lab records and results used in proper medical care, (c) typical daily street level operational harassment – often in collaboration with state and local police powers agencies, as well as (d) deprivation of employment, forced labor, and human trafficking, prohibited under 18 U.S.C. §§ 1961-1968 and Title 42 Chapter 21 Civil Rights,
- (iv) Without limitation as to any unidentified and/or unknown identities of certain defendants organized under color of law as state secret entities, within the federal executive, defendants DOJ, DHHS, DHS, USSS, and other federal police powers agencies, and other federal executive departments and agencies have and do pursue an associated-in-fact enterprise pattern of rights and racketeering acts, violations, and injuries against these plaintiffs; and have and do, from time to time, conspire with and sustain support for the above named primary federal police powers operations; as well as conspire, sustain, support, and stand aside from the sovereign operations of other police powers and intelligence departments and agencies, both foreign and domestic, all in their acts and in their failures to act,
- (v) other state and local police powers defendants have and do pursue direct pretexting and entrapment acts including, without limitation, through unfounded accusations related to

personal conduct and through direct field harassment of civil rights, prohibited under 18 U.S.C. §§ 1961-1968 and Title 42 Chapter 21 Civil Rights.

State law violations are in addition to the above mentioned general pattern of practice. This division of malign labors and bad faith acts which have and do injure these plaintiffs is generally consistent with the patterns noted over the past years by Lead Plaintiff, but discovery is needed to establish the next level of specificity for proper attribution of particular acts to provide proof of culpability and extent of liability at trial.

103. Lead Plaintiff and certain other injured members of the class, including without limitation both his former spouses, had direct professional and/or personal direct contact relationships with the institutional defendants, and with each and every one of the named individual defendants at various times while those individual defendants acted and operated in knowing bad faith under assumed names before disappearing to other identities and locations through their staged imaginary deaths, routine transfers, job changes, and other apparently natural but actually orchestrated actions. Those relationships and bad faith interactions, undertaken in secret against these plaintiffs, ranged from momentary contact to years and decades, and from tens of hours to thousands of hours of direct interpersonal contact.

104. Lead Plaintiff also had personal relationships with other known and identified police powers personnel including, without limitation, Gregory R. Boyle (King County, Washington Sheriff's Department) whose ex-wife Lynne shared a co-habitation and then marital community, and whose two daughters shared a roof and life experiences as teenage minor children with their stepfather Lead Plaintiff for about 7 years from 1980 to 1987. FBI agent Bruce Ciosacchi (intelligence operations, whose spouse Margaret was a co-worker of both Lead Plaintiff and first wife Lynne at Safeco, the 1980 financial audit professional assignment where they met), and FBI

agent Kerry Vanderberry (bank robbery squad, whose wife Laurie was a co-worker of second wife Jeanette) at various times between 1980 and 2004. As with many of the named individual defendants herein, those relationships included, for example, holiday parties, restaurant meals and drinks, baby-sitting of infants, and zoo visits with minor children, and a myriad of other normal family and friends activities over many decades of fraudulent concealment. These individuals are not named as defendants in this Complaint as they played no known direct role in the acts, violations, and injuries described in the Complaint, though they were undoubtedly aware of the circumstances, corrupt acts, violations, and injuries to the Lead Plaintiff and to other plaintiffs of this class and could be accountable for failures to act in their neglect to prevent. Only the most serious and egregious acts, violations, and injuries to these plaintiffs are described in this complaint.

105. The identities of the individual defendants who are named are not in doubt, their relationships to the Lead Plaintiff are well established, and those identities and relationships can be corroborated by witnesses not named herein. These specific multi-point identifications connect them individually, and definitively connect the departments and agencies in which they worked, to bad faith acts against Lead Plaintiff and other members of this class, including both of Lead Plaintiff's former spouses. These now identified individual defendants were finally able to be unmasked through the rigorous and systematic forensic review which began in June 2021 with a very basic analysis of the constitutional rights violations and the pattern of racketeering acts by the associated-in-fact enterprise. This analysis of acts, violations, and injuries, led in turn to unmasking the true original purpose behind those fraudulently concealed acts, the concealment of the illegal BRMT bioweapon and bioweapon delivery system and its development through illegal medical experiments on adults and their children in American families, who faithfully

served their nation and were originally discriminated against by defendants ARMY and CIA, then by the myriad other defendants, in their criminal violations, without limitation, of 18 U.S.C. §§ 175, 1961-1968, 5 USC 301, and 42 USC Chapters 21, 21A, and 21B. This entire pattern of criminal conduct has been hidden by color of law abuse of state secret privilege and police powers exemptions, and by patterns of defamation initiated by named individual defendants among the federal executive defendants for slanderous incriminations of these plaintiffs and for their own self-exculpatory purposes. Beginning in mid-2022, when ARPAIO only was initially identified as an individual defendant, then continuing in September 2023 through March 2024, when more than a dozen individual defendants were finally able to be identified. The actual identities of these previously falsely named undercover persons were not known to Lead Plaintiff as they had disappeared with (i) the passage of time, with (ii) promotions, reassignments, changes in location, and changes in career, and (iii) through fraudulent faked deaths out of their undercover roles and identities. These individual defendants were subsequently “reborn” into identities not known to the Lead Plaintiff during those prior periods of direct contact.

**Table: Named Defendants Associations And Relationships**

| <b>Named Defendant</b>                  | <b>Cover Employer When Known</b>   | <b>Actual Employer When Known, Forensic Unmasking Dates</b> | <b>Undercover Role When Known</b>  |
|---|--|---|--|
| AUSTIN, LLOYD, fka name not recollected | CNA Industrial Engineering, reporting to Arthur Thompson, indirectly to Lead Plaintiff | ARMY, Fall 2023   | Project Manager, HomeGrocer – Renton, WA distribution center renovation and automation project |
| BANNON, STEVE, fka Timothy C. Easton    | Deloitte Seattle, 1980s  | CIA, Summer 2023  | Manager, Micronesia (Palau for Interior Department) and Latin America projects                 |
| THORPE, Gerald L.                       | Deloitte Seattle, 1980s  |   | Manager, Consulting  |

|  |  |  |   |
|--|--|--|---|
| BREYER, STEPHEN, fka Jack Sackville, West                        | Self as Architect  | Likely ARMY or CIA, formerly with ARMY Intelligence, Summer 2023 | Self as Architect, primarily for public school districts in and around Spokane, WA  |
| BURNS, WILLIAM   | Self as OB/GYN practicing in Kirkland, WA  | CIA, Summer 2023   | Board member and investor in LazerSoft employing STONE, then Lead Plaintiff   |
| GARLAND, MERRICK fka Robert Mandich, possibly Stuart Bettesworth | WSU Perham Hall and Nez Perce Village student apartments, possibly Decatur High School | DOJ, likely FBI  | WSU undergraduate student, possibly Decatur High School student   |
| HICKMAN, John Reed   | Deloitte Seattle   | FBI commercial cover embed                                       | Manager, Consulting   |
| BLAIR, John R.   | Deloitte Seattle   | CIA commercial cover embed                                       | Director, Consulting  |
| SEPPI, Arnold E.   | Deloitte Seattle   | FBI commercial cover embed                                       | Manager, Consulting   |
| BREHM, Karlton   | Deloitte Seattle   | FBI commercial cover embed                                       | Manager, Consulting   |
| SPERBER William  | Deloitte Seattle   | FBI commercial cover embed                                       | Director, National Banking Group  |
| CAREY, David J.  | Deloitte Seattle   |  | Investor, Alliance  |
| SPADONI, Mark  | Westin Hotels  |  | Project Manager   |
| ZOULAS, John   | Westin Hotels  | CIA commercial cover embed                                       | Manager, Corporate  |
| ASTENGO, Martin  | Westin Hotels  | MI-6 commercial cover embed                                      | Resident Manager, Seattle   |
| TREADWAY, James  | Westin Hotels  | USMS, FBI, CIA commercial cover                                  | General Manager, Seattle<br>Various domestic and international commercial cover intelligence, spying, and espionage assignments |
| STONE, ROGER, fka David P Moller                                 | Deloitte Seattle, 1980s  | CIA, Summer 2023   | Manager, South Africa ATM project   |
| VINDMAN, ALEXANDER, fka Paul Yarbrough                           | USAF Officer and Engineering Manager, Boeing AWACS                                     | ARMY, Fall 2023  | Brother-in-law through Lead Plaintiff's marriage to Jeanette  |
| VINDMAN, Yvegeney, fka Greg Yarbrough                            | CSC employee, Birmingham, AL   | ARMY, Fall 2023  | Brother-in-law through Lead Plaintiff's marriage to Jeanette  |

| <b>Named Defendant</b>  | <b>Cover Employer When Known</b>  | <b>Actual Employer When Known, Forensic Unmasking Timeframe</b>                     | <b>Undercover Role When Known</b>   |
|---|---|---|---|
| WILKINS, Warren   | LazerSoft hired by STONE, worked for Lead Plaintiff after STONE's orchestrated departure                        | ARMY, originally also known to be Lt. Colonel, then Colonel, WA ARMY National Guard | Sales Representative, LazerSoft hired by STONE,   |
| WSU WOMAN ON STAIRS, unknown but regularly seen as described at LPEE page 12251 | Unknown, later associated with STONE through documentary film footage, late 1970s                               | Unknown, probably CIA, Summer 2023  | WSU Student   |
| MELBER, ARI fka Wes Lewis   | Regional Sales Manager, Negro Modelo (Corona Beer)  | FBI, Summer 2023  | Romantic interest, later husband to Theresa, half-sister of Jeanette, brother-in-law through Lead Plaintiff's second wife Jeanette, as orchestrated to Lead Plaintiff by WATERS |
| RUBIN, LISA, fka Michelle Yarbrough   |   | FBI, Summer 2023  | Sister-in-law through Lead Plaintiff's marriage to Jeanette   |
| WEISSMAN, ANDREW, fka Lyle Whiteman   | Puget Consumers Cooperative, reporting to Lead Plaintiff and Board; later organized NutraSource using PCC funds | FBI, Summer 2023  | General Manager, PCC; NutraSource Board member with Lead Plaintiff  |
| ROSENBERG, CHARLES, fka Chuck LeFevre, then William Drumm                       | NutraSource, Establish  | FBI, Summer 2023  | CEO, NutraSource; General Manager, Establish  |
| CALDWELL, LESLIE fka name not recollected                                       | Seed & Berry, law firm  | DOJ, Fall 2023  | Attorney representing Allegent, LLC co-owned by Lead Plaintiff  |

| <b>Named Defendant</b>            | <b>Cover Employer When Known</b>   | <b>Actual Employer When Known, Forensic Unmasking Timeframe</b>           | <b>Undercover Role When Known</b>   |
|-----------------------------------|--|---|---|
| SULLIVAN, RAY                     | Self as Outside Attorney   | DHS Customs and Border Protection, Fall 2023                              | Outside Attorney Winnett, introduced by JACKSON, CIA  |
| BIVENS, GEORGE<br>fka John Steele | Direct report at Alliance, co-owned and run by Lead Plaintiff as CEO                               | Unknown, currently Lt. Colonel, Pennsylvania State Police, September 2023 | Superintendent – Sea-Tac Airport B, C, D Concourse expansion asbestos abatement subcontract to M.A. Mortenson |
| ARPAIO, JOE, fka Greg Crossgrove  | Self as Independent Produce Consultant, Arizona to Winnett, Lead Plaintiff's organic foods startup | Maricopa County Sheriff, Arizona, first unmasked in SDNY letter 220622    | Independent Produce Consultant, Arizona   |

Those individuals' now obvious relationships with the named defendant police powers institutions clinched the identities of those institutional police powers defendants. Those identities had been previously presumed but were not dispositively confirmable due to (i) the defendant entities' fraudulent concealment, (ii) the defendant entities' flawed cover-up of information as at Interline Exhibits 16-19, (iii) the defendant entities' systematic and still continuing refusals to produce information in response to Lead Plaintiff's lawful requests under FOIA, Privacy Act, (violating 5 U.S.C. § 52) and other public information laws (New York State's Freedom Of Information Law "FOIL" Pub Off L. §§ 84-90 violated by defendant NYPD) during early forensic analysis in 2021, documented at LPEE pages 508-541. See also the table at paragraph 228 for abbreviations commonly used for indexing emails from these and other defendants.

106. It is nearly impossible for the Lead Plaintiff to establish even now, through careful forensic analysis, which specific institutional and individual defendants were directly involved at



specific times and locations in which particular acts, violations, and injuries and which coordinated patterns of acts, violations, and injuries were performed by which specific defendant. Such is the nature of malign undercover operations and their officers, agents, and informants acting in bad faith. Discovery is required to establish which specific defendant(s) engaged in which element of which set of acts which comprise the entire pattern across decades, while those defendants claimed good faith police powers exemptions and privileges to engage in bad faith acts under fraudulent concealment. The specific culpability of institutional and individual defendants for specific injuries and patterns of injuries will result from specific answers to this Complaint, and from admissions during discovery and will be proven at trial.

107. Discovery will most probably operate to collapse the number of actual defendants from the myriad cover entities and cover individual identities to their actual institutional and individual identities, simplifying the litigation and substantially reducing the overall number of parties. In many cases, the predicate act frauds are most probably the product of a few prolific and profligate police powers agencies and commercial collaborators which were actually run as undercover operations on private premises, rather than by the commercial entities themselves, or using by use of numerous cover entities to conceal one or a few actual defendant identities. For example, as the amended Complaint recounts in specific detail operations undertaken by, without limitation, defendants FBI, USMS, NYPD, ARPAIO (including with ARPAIO both defendant MARICOPA COUNTY and defendant Maricopa County Sheriff's Department (MARICOPA SHERIFF)) are difficult to discern as to the specific institutional defendant whose personnel undertook specific acts, as they are closely intertwined and lack obvious distinction one from the other, in their long-running pattern(s) of interfering with interstate commerce, and with civil and constitutional rights, and their use of the premises, personnel, and/or co-opted email addresses of

major American companies, including, without limitation, WALMART (Interline Exhibits 9-10), KROGER, COSTCO, Willmeng Construction, JLL Commercial Realty, Bio-Lab, Clipper Windpower, PPG Industries, and dozens of others, as well as those defendants own independent commercial covers including, without limitation, CNA Industrial Engineering, and ESTABLISH, where Lead Plaintiff was fraudulently employed, apparently by FAUCI, ROSENBERG and ROSS on fraudulent projects, both of which entities also included human trafficking operations by defendants FAUCI, ROSENBERG, and others of defendant UNITED STATES.

108. What can be definitively established now is that no actual interstate commerce was ever permitted by these defendants, that these locations were devoid of other actors than these police powers defendants and their co-conspirators acting in concert so independent witnesses were deliberately disallowed, and in their individual and conspiratorial actions, they intended and did isolate the Lead Plaintiff from ordinary and authentic interactions in life and commerce, and intended to and did systematically abridge constitutionally guaranteed rights to conduct personal and commercial endeavors without undue and perpetual interferences of government. This also operates as a clear demonstration of the long-perpetuated pattern of malign and illegal practices described above which these police powers defendants have carried forward and perpetuated from 1950s-1970s defendant FBI Cointelpro origins, from 1950s-1970s defendant CIA MKUltra origins, and from other systematically abusive and predatory police powers practices in violations of 18 U.S.C. §§ 241, 242, such as the documented sustained patterns of FISA Act violations for 45 years and Patriot Act Section 702 violations for 15 years, into the present time, which while not the specific subject of this litigation, have and do persist over decades among these police powers defendants, and demonstrate their long-running discriminatory scofflaw

approach and methods in their administration of unequal “justice,” through their acts, violations, and injuries, which ARE the subject of this litigation by these plaintiffs

109. Defendants UNITED STATES, NYPD, PAPD, and NJTPD, as well as other police powers agencies with operations in various districts of New York and New Jersey, directed and/or perpetrated much of the illegal activity from 2007 to present, together with collaborative and independent actions which occurred in (i) Washington, California, and Arizona, among other states, and in (ii) Canada and the United Kingdom where the Lead Plaintiff was physically present, and in (iii) numerous other countries where he attempted to transact commercial operations but which have been and are orchestrated and/or disrupted primarily by defendant UNITED STATES departments and agencies, in their active interferences with rights and with interstate commerce. Some of those activities, including lethality attempts and other physical injuries, almost certainly were and are directly coordinated with defendants CIA and ARMY operations personnel, who have and do deploy and use the illegal BRMT bioweapon and bioweapon delivery system against the Lead Plaintiff. This illegal pattern of racketeering acts by this associated-in-fact enterprise has been and is true for virtually every activity attempted to be undertaken in interstate commerce.

## **A2. Individual Defendants Generally**

110. The principal individual defendants are identified by the Lead Plaintiff in a manner which is as specific as possible where such identities were finally able to be discerned through careful forensic analysis and independent biographical sources backchecking. Other police powers individual defendant identifications in the instant complaint comply with the standard established for *Bivens* type identifications of unknown individual police powers defendants who

have and do act in individually and in concert, concealing their identities, in bad faith acts, and in the same manner as they would in lawful undercover police powers operations.

111. The veracity of the Lead Plaintiff's identifications of key individual defendants acting in bad faith in federal capacities can be readily ascertained with the cooperation of key witnesses to their roles and acts in the relevant time periods. For example, the identification of Stephen BREYER, a former member of the Supreme Court, as a defendant can be attested to by Laurie DOLAN, a former Chief of Staff to former Governor of Washington Christine Gregoire. Laurie DOLAN was known to Lead Plaintiff as Laurie Sackville-West, a daughter-in-law of Jack Sackville-West (BREYER) married to his son David, with infant child Anne, while BREYER managed implementation of the illegal BRMT bioweapon and related illegal human medical experiments in Spokane, Washington. DOLAN can attest to Lead Plaintiff's acquaintance and friendship with the "Sackville-West family" in Spokane, Washington at 1424 South Maple Street and other locations. Lead Plaintiff met both DOLAN and BREYER after being befriended by a person he knew as William (Bill) Sackville-West. Bill presented as the college student son of Jack while in Perham Hall, a student dormitory at Washington State University, Pullman Washington, when Lead Plaintiff was 19 years old in the Fall of 1974. Lead Plaintiff was a frequent visitor to Spokane and the home he knew as the Sackville-West residence on Spokane's South Hill. He also visited David and Laurie Sackville-West (DOLAN) at their home in the Spokane area, before and after Anne Sackville-West was born. This can be easily verified.

112. Similar veracity attaches to identifications of other individual defendants including, without limitation, WEISSMAN (FBI) and ROSENBERG (FBI and DEA), STONE, BANNON, THORPE, and ZOULAS, (all CIA) among others. Both WEISSMAN (FBI) and ROSENBERG (FBI and DEA) reported to corporate governing Boards which Lead Plaintiff served on while

they were illegally embedded executives at Puget Consumers Cooperative (PCC) and NutraSource, both in Seattle, Washington, which FBI illegally co-opted and illegally managed beginning in the 1980s. Others who knew them, including, without limitation, Randy Lee, the now retired long-time CFO of PCC, will be able to verify their roles and conduct in those organizations, and their contacts with Lead Plaintiff. The same fact patterns are true for Roger STONE (CIA) and BURNS (CIA), as well as for Steve BANNON (CIA), the widely known former aide to President Trump, and Gerald Lee THORPE (as known to Lead Plaintiff from WSU graduate school as well) who were co-workers at Deloitte Seattle, and witnesses to STONE's (CIA) presence at Deloitte Seattle, and to certain acts described in the instant complaint. STONE will establish BURNS presence and participation in LazerSoft funding and governance, where Lead Plaintiff worked and later led the small team, including Colonel Warren WILKINS (Washington ARMY National Guard), R. Kent TARPLEY, and Stephen WATERS, whose specific federal employment is not well established, plausibly USMS.

### **A3. Additional Unknown Defendants Generally**

113. Additional defendants known only through email contacts and other means are identified as unknown police powers defendants simply because their identities are not currently discernible to the Lead Plaintiff. These defendants' actions, both those of entities and of individuals, violated various federal and state statutes as specifically described in the related evidence including, without limitation, through emails, contracts, bank statements, and wire transfer receipts, which comprise evidence of frauds and other injuries, to rights and in interstate commerce. Several thousand of these specific acts, violations, and injuries are pled with particularity in accordance with F. R. Civ. P. Rule 9(b). The intent of this litigation is to establish the pattern of racketeering acts, not to specifically assign each and every single act to a specific

individual defendant, though this is done wherever it is reasonably possible to do so within the pattern as currently known and understood. The actual defendants' behind each of these names and email addresses is currently unknowable, as is the actual entity and/or individual identity of each of these defendants, who most probably posed in multiple roles in undercover operations, which will quite probably be able to be collapsed into a much smaller universe of defendants who actually perpetrated the rights violations and particular racketeering acts through defendants' answers and through discovery. For example, Lead Plaintiff sent email solicitations related to interstate commerce financings to several hundred people on multiple occasions, as did an undercover FBI agent who posed as Andrew ALTAHAWI, the principal of various ADAMSON Brothers entities. Typically, such solicitations will secure some level of interest, anywhere from 1% to 10%. None of these mass email solicitation campaigns ever received any significant level of interest, none ever resulted in even \$1 of investment, and most of these solicitations secured no interest of any kind. This is strongly indicative of fraudulent use of bogus email addresses and/or of active suppression of those email solicitations, each of which cost thousands of dollars to undertake by paying for dishonest services, by using rented lists and by other means. This same pattern of fraudulent conduct has been true of the deliberate interferences with and as the Lead Plaintiff's own contacts over time by these illegal police powers racketeering act interferences in interstate commerce including, without limitation, for the corrupt purposes of violating constitutional rights, sustaining their illegal cover-up of involuntary servitude and the continued development, testing, and deployment in (i) the illegal BRMT bioweapon and bioweapon delivery system against these plaintiffs, 18 U.S.C. § 175, in (ii) continued violation of the ratified 1972 Bioweapons Treaty, in (iii) making terroristic threats toward populations and toward other nations through the publicity and operation of the illegal

BRMT bioweapon and bioweapon delivery system against the Lead Plaintiff in full public view of the world, 18 USC § 2331(1)(B)(i) and 25 CFR § 11.402, and (iv) most probably in acts of war against other nations by the federal executive in targeting specific persons in those nations' governmental leadership ranks without the constitutionally required consent of Congress, Constitution Article I, Section 8, clause 11.

#### **A4. Police Powers Undercover Defendants' Culpability Must Be Established Through Answers And Discovery**

114. It is necessary that each and every participating police power defendant (both institutional and individual) review each and every set of facts presented, and answer, admitting or denying their own degree of culpability (whether through their own direct act or vicariously through conspiracy) in that specific act or set of acts. It is impossible for the Lead Plaintiff, or for this Court, to deduce specific defendants' identities without this essential step in the legal process to facilitate proper assignment of defendants' scope, extent, and degree of culpability. There is no other feasible means known to plaintiffs to accomplish this result. This pattern of pleading is entirely consistent with normal practices, as in *Bivens* styled claims.

115. Paragraphs 115 through 118 are reserved.

#### **B. Known Federal Defendants, In Their Official Capacity**

119. Defendant UNITED STATES is a collective pseudonym for the unidentified and unknown departments and agencies of the federal executive branch who are represented by the officials sued in their official capacity, as identified at paragraphs 120 through 133 herein. It is not necessarily possible to determine which department or agency is specifically responsible for each particular element of a specific claim for relief/cause of action, as these operations have been and are at times conducted in varying combinations with multiple departments and agencies of the federal government, and have been and are at times, conducted in cooperation and in co-

conspiracy with state, local, and foreign governments, who themselves also have certain sovereign rights and abilities to conduct operations regardless of direct involvement, consent, or concurrence by federal executive departments and agencies. Plaintiffs have made positive identifications and good faith presumptions of identities of defendants wherever possible and to the degree feasible without the technical and legal means to determine with precision which defendant(s) perpetrated which specific acts and elements of acts. The general lines of presumed and typical responsibility are based upon the identifications of certain individual defendants, the acts in which those individual defendants are directly inculpated, and the known institutional defendant associations to define these patterns, which patterns are identified at paragraph 102. The final disposition of responsibility and liability for each specific act, violation, and injury requires discovery for definitive determination, given the color of law abuses of state secrets privilege and police powers exemptions and the entangled conspiratorial pattern of racketeering acts and rights violations conducted by these defendants. Defendants used undercover and other agents, officers, confidential informants, and contractors, wrongful investigations lacking cause under color of law, assets and myriad frauds and violations of civil rights in acting against, threatening, retaliating against, and in failing to protect Lead Plaintiff, both separately and jointly. Defendants engaged with Lead Plaintiff in their fraudulent roles as part of defendant UNITED STATES' illegal BRMT bioweapon and bioweapon delivery system, rights violations, and associated-in-fact pattern of racketeering acts and conspiracy. Defendants knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendants, as bad faith actors and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.



120. William BURNS is Director, Central Intelligence Agency headquartered in Vienna, VA, CIA herein, with field offices in the United States and personnel within and without the United States, a nexus for substantial acts against Lead Plaintiff. BURNS was formerly known as Patrick Heffron (BURNS), an OB/GYN physician who practiced in Kirkland, Washington, an investor in and Board member of LazerSoft, Seattle, WA where Lead Plaintiff was human trafficked for employment reporting initially to STONE, and while in that identity BURNS was directly and personally involved in illegal BRMT medical experimentation on humans and in the cover-up of related injuries committed in interstate commerce and against civil rights against Lead Plaintiff from at least 1986 to 1992. Defendants used undercover and other agents, officers, confidential informants, and contractors, wrongful investigations lacking cause under color of law, assets and myriad frauds and violations of civil rights in acting against, threatening, and retaliating against, and in failing to protect Lead Plaintiff both separately and jointly. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES' illegal BRMT bioweapon and bioweapon delivery system, rights violations, and associated-in-fact pattern of racketeering acts and conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

121. Christopher WRAY is Director, Federal Bureau of Investigation, FBI herein, an agency of the Department of Justice, headquartered in Washington, DC with field offices throughout the United States and personnel within and without the United States, a nexus for substantial acts against Lead Plaintiff. Defendants used undercover and other agents, officers and confidential informants, wrongful investigations lacking cause under color of law, assets and

myriad frauds and violations of civil rights in acting against, threatening, and retaliating against, and in failing to protect Lead Plaintiff both separately and jointly. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES' illegal BRMT bioweapon and bioweapon delivery system, rights violations, and associated-in-fact pattern of racketeering acts and conspiracy acting through, among myriad others, WEISSMAN, ROSENBERG, MELBER, RUBIN, TURNER, MAGGARD. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

122. Merrick GARLAND is Attorney General of the United States, manages the U.S. Department of Justice, DOJ herein, headquartered in Washington, DC, with agencies, operations, and personnel throughout the United States and the world, a nexus for substantial acts against Lead Plaintiff. Defendants used, without limitation, Department of Justice, Federal Bureau of Investigation, United States Marshals Service, Drug Enforcement Administration, Bureau of Alcohol, Tobacco, Firearms and Explosives, malignly exploited national security laws and regulations through its National Security Division and other operations of the Department, and used other departmental and subordinate agency personnel, facilities, contractors, undercover and other agents, officers and confidential informants, wrongful investigations lacking cause under color of law, assets and myriad frauds and violations of civil rights both jointly and severally in acting against, threatening, and retaliating against, and in failing to protect Lead Plaintiff. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES' illegal BRMT bioweapon and bioweapon delivery system, rights violations, and associated-in-fact pattern of racketeering acts and conspiracy acting through, including acts

and failures to act by FBI, USMS, and CALDWELL, and among myriad others, WEISSMAN, ROSENBERG, MELBER, RUBIN, TURNER, MAGGARD. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

123. Ronald DAVIS is Director, United States Marshals Service, USMS herein, an agency of the Department of Justice, headquartered in Arlington, Virginia, with field offices throughout the United States and personnel within and without the United States, a nexus for substantial acts against Lead Plaintiff. Defendants used undercover and other agents, officers and confidential informants, wrongful investigations lacking cause under color of law, assets and myriad frauds and violations of civil rights in acting against, threatening, and retaliating against, and in failing to protect Lead Plaintiff both separately and jointly. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES' illegal BRMT bioweapon and bioweapon delivery system, rights violations, and associated-in-fact pattern of racketeering acts and conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

124. Ms. Avril HAINES is Director, Office of the Director of National Intelligence, DNI herein, with agencies, operations, and personnel throughout the United States and the world, a nexus for substantial acts against Lead Plaintiff. Defendants used undercover and other agents, officers, confidential informants, and contractors, wrongful investigations lacking cause under color of law, assets and myriad frauds and violations of civil rights in acting against, threatening,

and retaliating against, and in failing to protect Lead Plaintiff both separately and jointly. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES' illegal BRMT bioweapon and bioweapon delivery system, rights violations, and associated-in-fact pattern of racketeering acts and conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act including, through negligent supervision of defendant UNITED STATES intelligence agencies. Defendant, as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

125. Lloyd AUSTIN is Secretary, Department of Defense, DOD herein, headquartered in Arlington, VA, with departments, agencies, operations, and personnel throughout the United States and the world, a nexus for substantial acts against Lead Plaintiff through its military departments, joint operations, and the Office of the Secretary, including, without limitation, ARMY, USAF, NAVY, MARINES, DARPA. Defendants used uniformed and out of uniform military officers and personnel, facilities, contractors, undercover and other agents, officers and confidential informants, wrongful investigations lacking cause under color of law, assets and myriad frauds and violations of civil rights in acting against, threatening, and retaliating against, and in failing to protect Lead Plaintiff both separately and jointly. Defendants used undercover and other agents, officers, confidential informants, and contractors, wrongful investigations lacking cause under color of law, assets and myriad frauds and violations of civil rights in acting against, threatening, and retaliating against, and in failing to protect Lead Plaintiff both separately and jointly. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES' illegal BRMT bioweapon and bioweapon delivery system, rights violations, and associated-in-fact pattern of racketeering acts and conspiracy. Defendant

knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act.

AUSTIN himself and Alexander and Yvgeney VINDMAN, while ARMY officers, appeared in civilian dress only and undercover, in violation of posse comitatus law protecting civilians from military force against them which was being perpetrated and perpetuated by DOD department ARMY, as well as Defendant, as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs. Alexander VINDMAN appeared in false USAF dress during this same time period while serving as an ARMY intelligence officer. Defendant, as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

126. Ms. Christine WORMUTH is Secretary, United States Army, ARMY herein, headquartered in Arlington, VA, with agencies, operations, and personnel throughout the United States and the world, a nexus for substantial acts against Lead Plaintiff. Defendants used uniformed military officers and personnel, facilities, contractors, undercover and other agents, officers and confidential informants, wrongful investigations lacking cause under color of law, assets and myriad frauds and violations of civil rights in acting against, threatening, and retaliating against, and in failing to protect Lead Plaintiff both separately and jointly. Defendants used undercover and other agents, officers, confidential informants, and contractors, wrongful investigations lacking cause under color of law, assets and myriad frauds and violations of civil rights in acting against, threatening, and retaliating against, and in failing to protect Lead Plaintiff both separately and jointly. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES' illegal BRMT bioweapon and bioweapon delivery system, rights violations, and associated-in-fact pattern of racketeering acts and conspiracy.

Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

127. Dr. Stefanie TOMPKINS is Director, Defense Advanced Research Projects Agency, DARPA herein, headquartered in Arlington, VA with field offices and personnel throughout the United States, a nexus for substantial acts against Lead Plaintiff. Defendants used personnel and contractors, private personal medical and other information illegally acquired without consent, assets and myriad frauds and violations of civil rights in acting against, threatening, and retaliating against, and in failing to protect Lead Plaintiff both separately and jointly. Defendants used undercover and other agents, officers, confidential informants, and contractors, wrongful investigations lacking cause under color of law, assets and myriad frauds and violations of civil rights in acting against, threatening, and retaliating against, and in failing to protect Lead Plaintiff both separately and jointly. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES' illegal BRMT bioweapon and bioweapon delivery system, rights violations, and associated-in-fact pattern of racketeering acts and conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

128. Alejandro MAYORKAS is Secretary, Department of Homeland Security, DHS herein, headquartered in Washington, DC with numerous agencies and field offices throughout the United States and personnel within and without the United States, including, without

limitation, CPB, USSS, and was and is a nexus for substantial acts against Lead Plaintiff. Defendants used facilities, contractors, undercover and other agents, officers and confidential informants, wrongful investigations lacking cause under color of law, assets and myriad frauds and violations of civil rights in acting against, threatening, and retaliating against, and in failing to protect Lead Plaintiff both separately and jointly. Defendants used undercover and other agents, officers, confidential informants, and contractors, wrongful investigations lacking cause under color of law, assets and myriad frauds and violations of civil rights in acting against, threatening, and retaliating against, and in failing to protect Lead Plaintiff both separately and jointly. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES' illegal BRMT bioweapon and bioweapon delivery system, rights violations, and associated-in-fact pattern of racketeering acts and conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

129. Kimberly CHEATLE is Director, United States Secret Service, USSS herein, an agency of the Department of Homeland Security, headquartered in Washington, DC with field offices throughout the United States and personnel within and without the United States, a nexus for substantial acts against Lead Plaintiff. Defendants used undercover and other agents, officers, confidential informants and contractors, wrongful investigations lacking cause under color of law, assets and myriad frauds and violations of civil rights in acting against, threatening, and retaliating against, and in failing to protect, Lead Plaintiff both separately and jointly. Defendants used the Presidential detail, undercover and other agents, officers and confidential informants, wrongful investigations lacking cause under color of law, assets and myriad frauds and violations

of civil rights in acting against, threatening, and retaliating against, and in failing to protect Lead Plaintiff both separately and jointly. Defendants used undercover and other agents, officers, confidential informants, and contractors, wrongful investigations lacking cause under color of law, assets and myriad frauds and violations of civil rights in acting against, threatening, and retaliating against, and in failing to protect Lead Plaintiff both separately and jointly. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES' illegal BRMT bioweapon and bioweapon delivery system, rights violations, and associated-in-fact pattern of racketeering acts and conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

130. Xavier Becerra is Secretary, Department of Health and Human Services, DHHS herein, headquartered in Washington, DC with field offices and personnel throughout the United States, including the National Institute of Allergy and Infectious Diseases where defendant FAUCI worked, and was and is a nexus for substantial acts against Lead Plaintiff. Defendants used personnel and contractors, private personal medical and other information illegally acquired without consent, assets and myriad frauds and violations of civil rights in acting against, threatening, and retaliating against, and in failing to protect Lead Plaintiff both separately and jointly. Defendants used undercover and other agents, officers, confidential informants, and contractors, wrongful investigations lacking cause under color of law, assets and myriad frauds and violations of civil rights in acting against, threatening, and retaliating against, and in failing to protect Lead Plaintiff both separately and jointly. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES' illegal BRMT bioweapon and



bioweapon delivery system, rights violations, and associated-in-fact pattern of racketeering acts and conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

131. Jeanne Marrazzo, M.D., M.P.H. is Director, National Institute of Allergy and Infectious Diseases, NIAID herein, headquartered in Bethesda, MD with field offices and personnel throughout the United States, where defendant FAUCI worked, and was and is a nexus for substantial acts against Lead Plaintiff. Defendants used personnel and contractors, private personal medical and other information illegally acquired without consent, assets and myriad frauds and violations of civil rights in acting against, threatening, and retaliating against, and in failing to protect Lead Plaintiff both separately and jointly. Defendants used undercover and other agents, officers, confidential informants, and contractors, wrongful investigations lacking cause under color of law, assets and myriad frauds and violations of civil rights in acting against, threatening, and retaliating against, and in failing to protect Lead Plaintiff both separately and jointly. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES' illegal BRMT bioweapon and bioweapon delivery system, rights violations, and associated-in-fact pattern of racketeering acts and conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

132. Colleen Shogan is Archivist of the United States, The National Archives and Records Administration (NARA herein), headquartered in College Park, MD. NARA was and is

a nexus for substantial acts in withholding information from the Lead Plaintiff. Defendants used personnel and contractors, private personal medical and other information illegally acquired without consent, assets and myriad frauds and violations of civil rights in acting against, threatening, and retaliating against, and in failing to protect Lead Plaintiff both separately and jointly. Defendants used undercover and other agents, officers, confidential informants, and contractors, wrongful investigations lacking cause under color of law, assets and myriad frauds and violations of civil rights in acting against, threatening, and retaliating against, and in failing to protect Lead Plaintiff both separately and jointly. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES' illegal BRMT bioweapon and bioweapon delivery system, rights violations, and associated-in-fact pattern of racketeering acts and conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

133. John Doe institutional department, agency, and office defendants include federal intelligence and police powers operations, public and private entities, groups, associations, as well as unknown individual persons. Unknown public entities include a variety of governments, their departments, agencies, and special purpose entities in various states and in other nations. Defendants used undercover and other agents, officers, confidential informants, and contractors, wrongful investigations lacking cause under color of law, assets and myriad frauds and violations of civil rights in acting against, threatening, and retaliating against, and in failing to protect Lead Plaintiff both separately and jointly. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES' illegal BRMT bioweapon and bioweapon delivery

system, rights violations, and associated-in-fact pattern of racketeering acts and conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

134. Paragraphs 134 through 135 are reserved.

**C. Known State and Local Defendants, In Their Official Capacity**

136. Federal Way School District, Federal Way, WA, a public school district in King County, Washington, FWSD herein, an independent governmental unit, was the nexus for operations conducted by defendant UNITED STATES in the systematic violations of constitutional rights of minor children and their parents while Lead Plaintiff attended school between the third grade and completion of high school. FWSD conspired with federal, state, and local governmental units, including police powers departments and agencies to conduct illegal human subject experiments on minor children, including by accommodating the embedding of federal intelligence and police powers personnel in classes posing as students, and as faculty and school administrators, arranged and funded the premature organization of Decatur High School three years before the school's campus was constructed, among other acts. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's human trafficking and involuntary servitude by actions and failures to act. Defendant as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and other unidentified plaintiffs of this class.

137. King County Sheriff's Department, Seattle, WA, a police powers agency of King County, Washington, KCSD herein, conspired with federal police powers and state police powers agencies to support and sustain violations of constitutional rights in the illegal BRMT bioweapon program as defendant UNITED STATES conducted illegal and unconstitutional human subject medical experiments on Lead Plaintiff and other family members and engaged in associated-in-fact enterprise patterns of racketeering acts against minor children, adults, and private enterprises from 1963. As Sheriff David Reichert was moving from his first KCSD employment in 1972 to the US House of Representatives in 2005, KCSD conspired with defendant UNITED STATES, ROSENBERG, FAUCI, FBI, CIA, and other co-conspirator defendants herein to orchestrate a variety of acts, violations, and injuries during that time period. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's human trafficking and involuntary servitude by actions and failures to act. Defendant, as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and other unidentified plaintiffs of this class.

138. State of Washington, Olympia, WA, WASH herein, acting through its governmental departments and agencies, conspired with federal police powers and state police powers agencies to support and sustain violations of constitutional rights in the illegal BRMT bioweapon program as defendant UNITED STATES conducted illegal and unconstitutional human subject medical experiments on Lead Plaintiff and other family members and engaged in associated-in-fact enterprise patterns of racketeering acts against minor children, adults, and private enterprises from 1963. WASH detailed state employees to pose as members of the team which surrounded the Lead Plaintiff in cover operations who then returned to state employment, including from the

Governor's office at various times and places between 1963 and 2005. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's human trafficking and involuntary servitude by actions and failures to act. Defendant as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and other unidentified plaintiffs of this class.

139. Washington State University, Pullman, WA, an independent agency of the State of Washington, WSU herein, was the nexus for operations conducted by defendant UNITED STATES in the systematic violations of constitutional rights of Lead Plaintiff while he attended the university at various times between 1974 and 1979. WSU conspired with federal, state, and local governmental units, including police powers departments and agencies to conduct illegal human subject experiments on US persons including, without limitation, Lead Plaintiff, by accommodating the embedding of federal intelligence and police powers personnel in classes posing as students, and as faculty and school administrators, among other acts. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's human trafficking and involuntary servitude by actions and failures to act. Defendant, as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and other unidentified plaintiffs of this class.

140. Eric ADAMS, Mayor, City of New York, Attention: Georgia Pestana, New York City Law Department. City of New York, NYC herein, a political subdivision of the State of New York, was and is a nexus for substantial acts against Lead Plaintiff. Defendants have and do use municipal assets and property, undercover and other officers, wrongful investigations lacking

cause under color of law, assets and myriad frauds and violations of civil rights in acting against, threatening, and retaliating against Lead Plaintiff both separately and jointly. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's human trafficking and involuntary servitude by actions and failures to act. Defendant, as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

141. Edward A. CABAN, Commissioner, City of New York Police Department, NYPD herein, Attention: Ernest F. Hart, Deputy Commissioner for Legal Matters, PALS Unit, One Police Plaza, New York, New York, a Department of the City of New York, a nexus for substantial acts against Lead Plaintiff. Defendants used undercover and other officers, wrongful investigations lacking cause under color of law, assets and myriad frauds and violations of civil rights in acting against, threatening, and retaliating against Lead Plaintiff both separately and jointly. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

142. Colonel Patrick J. CALLAHAN, State Police, State of New Jersey, NJSP herein, West Trenton, NJ, a department of the State of New Jersey, a nexus for substantial acts against Lead Plaintiff. Defendants used officers, wrongful investigations lacking cause under color of law, assets and myriad frauds in acting against, threatening, and retaliating against Lead Plaintiff both separately and jointly. Defendants used undercover and other officers, wrongful

investigations lacking cause under color of law, assets and myriad frauds and violations of civil rights in acting against, threatening, and retaliating against Lead Plaintiff both separately and jointly. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES illegal BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

143. John BILICH, Chief of Security, Port Authority of New York and New Jersey Police Department, PAPD herein, New York, NY, an agency of the Port Authority of New York and New Jersey, a nexus for substantial acts against Lead Plaintiff. Defendants used undercover and other officers, wrongful investigations lacking cause under color of law, assets and myriad frauds and violations of civil rights in acting against, threatening, and retaliating against Lead Plaintiff both separately and jointly. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

144. Christopher Trucillo - Chief Of Police, New Jersey Transit Police Department, NJTPD herein, Newark, New Jersey, a department of New Jersey Transit, itself an agency of the State of New Jersey, a nexus for substantial acts against Lead Plaintiff. Defendants used undercover and other officers, wrongful investigations lacking cause under color of law, assets and myriad frauds and violations of civil rights in acting against, threatening, and retaliating

against Lead Plaintiff both separately and jointly. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

145. Anthony CURETON is Sheriff, BERGEN SHERIFF herein, Bergen County Sheriff's Department, Hackensack, NJ, an agency of the County of Bergen, a political subdivision of the State of New Jersey, a nexus for substantial acts against Lead Plaintiff. Defendants used undercover and other officers, wrongful investigations lacking cause under color of law, assets and myriad frauds and violations of civil rights in acting against, threatening, and retaliating against Lead Plaintiff both separately and jointly. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

146. James TODESCO is County Executive, County of Bergen, BERGEN COUNTY herein, Hackensack, New Jersey, a political subdivision of the State of New Jersey, a nexus for substantial acts against Lead Plaintiff. Defendants used undercover and other officers, wrongful investigations lacking cause under color of law, assets and myriad frauds and violations of civil rights in acting against, threatening, and retaliating against Lead Plaintiff both separately and jointly. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant



UNITED STATES BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

147. Jennifer POKORSKI, County Manager, County of Maricopa County, Arizona, MARICOPA COUNTY herein, Attention: Maricopa County Attorney, a political subdivision of the State of Arizona, a nexus for substantial acts against Lead Plaintiff. Defendants used undercover and other officers, wrongful investigations lacking cause under color of law, assets and myriad frauds and violations of civil rights in acting against, threatening, and retaliating against Lead Plaintiff both separately and jointly. Defendant, through ARPAIO as County Sheriff and others in that Department, engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES illegal BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

148. Maricopa County Sheriff's Department, MARICOPA SHERIFF herein, Attention: Sheriff Paul PENZONE, Phoenix, AZ, a department of the County of Maricopa, a political subdivision of the State of Arizona, a nexus for substantial acts against Lead Plaintiff. Defendants used undercover and other officers, wrongful investigations lacking cause under color of law, assets and myriad frauds and violations of civil rights in acting against, threatening, and retaliating against Lead Plaintiff both separately and jointly. Defendant, through ARPAIO as County Sheriff and others in that Department, engaged with Lead Plaintiff in their fraudulent

role as part of defendant UNITED STATES’ illegal BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff’s involuntary servitude by actions and failures to act. Defendant, as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

149. Apparently private entities, incorporating (i) government police powers departments and agencies as institutional bad faith actors and (ii) as individual bad faith actors, (iii) members of the press, and (iv) other persons with special access granted by police powers, while acting in an associated-in-fact enterprise and conspiracy to engage and to violate, without limitation, (a) constitutional, (b) statutory and (c) common law rights, and (d) in patterns of racketeering acts in interstate commerce against plaintiffs:

**Table: Apparent Cover Entities - Police Powers, Press, Private**

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| <p><b>Police Powers Departments and Agencies Operating As And/Or Within Private Entities:</b></p> <p>PREFERRED TRUST Company, LLC<br/>2471 W. Horizon Ridge Parkway, Ste. 100<br/>Henderson, NV 89052, on behalf of Dean T. Smith, a presumed FBI cover company and agent</p> <p>SASHA’S FARM FRESH, legal from not known, on behalf of Dean T. Smith, a presumed FBI cover company and agent</p> <p>CFO SEARCH, Inc.<br/>c/o: Michael MAGGARD</p> | <p>The SHEFFORD Group, Inc.<br/>c/o The Corporation Trust Company<br/>Corporation Trust Center<br/>1209 Orange St<br/>Wilmington, DE 19801,</p> <p>SHEFFORD &amp; Associates, LLC<br/>c/o Jonathan CROSS<br/>3980 Premier Drive Suite 110<br/>High Point, NC 27265,</p> <p>SHEFFORD Capital Partners, LLC<br/>c/o: Jonathan CROSS<br/>2255 Glades Rd 324A Boca Raton, FL 33431,</p> <p>FRACTAL Advisors LLC<br/>c/o Michael ROZNOWSKI<br/>9308 Lee Court</p> | <p>BIBBY Financial Services, Inc.<br/>c/o C T Corporation System<br/>289 S Culver St.<br/>Lawrenceville, GA, 30046-4805,</p> <p>AXIAL Networks, Inc.<br/>c/o Peter Lehrman<br/>902 Broadway, 19TH Floor<br/>New York, NY 10010,</p> <p>TECHNOLOGY SALES LEADS, Inc. (TSL)<br/>c/o National Registered Agents, Inc<br/>155 Federal Street, Suite 700<br/>2nd Floor<br/>Boston MA 02110,</p> <p>ENGLEMAN Associates, Inc.</p> |
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| <p>9602 Kewanee<br/>Lubbock, TX 79424,</p> <p>BA BESTWICK CARDONE<br/>GROUP<br/>Bank of America, N.A.<br/>One Bryant Park<br/>New York, NY 10036</p> <p>DOMINICK &amp;<br/>DICKERMAN LLC<br/>c/o Corporation Service<br/>Company<br/>251 Little Falls Drive<br/>Wilmington, DE 19808,</p> <p>WEFUNDER Admin, LLC<br/>c/o Cogency Global Inc.<br/>850 New Burton Road, Suite<br/>201<br/>Dover, DE 19904,</p> <p>WEFUNDER Advisors, LLC<br/>c/o Cogency Global Inc.<br/>850 New Burton Road, Suite<br/>201<br/>Dover, DE 19904,</p> <p>WEFUNDER BD, LLC<br/>c/o Cogency Global Inc.<br/>850 New Burton Road, Suite<br/>201<br/>Dover, DE 19904,</p> <p>WEFUNDER, Inc.<br/>c/o Cogency Global Inc.<br/>850 New Burton Road, Suite<br/>201<br/>Dover, DE 19904,</p> <p>WEFUNDER Portal LLC<br/>c/o Cogency Global Inc.<br/>850 New Burton Road, Suite<br/>201<br/>Dover, DE 19904,</p> | <p>Leawood, KS 66206,</p> <p>CORNHUSKER Capital<br/>c/o Reginald MCGAUGH<br/>1545 North 18th ST<br/>Omaha, NE 68110,</p> <p>BANCO Advisors, LLC<br/>c/o GREG SMITH<br/>16100 N 71st St Ste 140,<br/>Scottsdale, AZ, 85254,</p> <p>INSIGHT NETWORK Spain<br/>c/o: Don KEISER<br/>Calle Antina 22 Primera<br/>Planta, 03130,<br/>St. Pola, Comunidad<br/>Valenciana, España.<br/>Teléfono: +34 96 541 17 58,</p> <p>MADISON STREET Capital<br/>Advisors, LLC<br/>c/o: Charles Botchway<br/>105 W MADISON STREET,<br/>12th Floor<br/>Chicago, IL 60602,</p> <p>NEW AMERICA LENDING,<br/>LLC<br/>c/o: David Choate HUGHES<br/>2812 Pat Tillman Drive<br/>Springfield, Illinois 62711,</p> <p>RICHARD A. MILLER<br/>Consulting, LLC<br/>c/o RICHARD A. MILLER<br/>15 Avery Street<br/>Tunkhannock, PA 18657,</p> <p>MULTIFUNDING, LLC<br/>921-A Bethlehem Pike, Suite<br/>206<br/>Ambler, PA 19002,</p> <p>SALLYPORT Commercial<br/>Finance, LLC</p> | <p>aka SOFTSELECT Systems<br/>c/o: Mark ENGLEMAN<br/>607 East Reserve Street<br/>Vancouver, Washington<br/>98661<br/>360-699-6150,</p> <p>ASSURE GROUP<br/>International, LLC<br/>c/o Alexander Gibbs<br/>Ste 2000<br/>1401 Mercantile Ln<br/>Largo MD 20774,</p> <p>ABT Trading Inc.<br/>c/o Registered Agents Inc.<br/>7901 4TH Street North<br/>Ste 300<br/>St. Petersburg, FL 33702,</p> <p>DC INTERNATIONAL LLC<br/>c/o Phillip G. DALEUSKI<br/>1471 Dewar Dr Ste 147<br/>Rock Springs, WY 82901,</p> <p>CONSUMERBASE LLC<br/>dba EXACT DATA<br/>c/o CT Corporation System<br/>208 S. LaSalle ST, Ste 814<br/>Chicago, IL 60604,</p> <p>TRADEKEY.COM, doing<br/>business in the United States<br/>through:<br/>ORBIT TECHNOLOGIES<br/>LLC<br/>264 Hemlock Terrace<br/>Teaneck, NJ 07666,</p> <p>WEBLINK.IN Pvt. Ltd.<br/>33 and 33A Rama Road<br/>Industrial Area, Shivaji Marg<br/>New Delhi, India,</p> <p>FOSHAN SHUNDE<br/>XinJianHan Trading Co, Ltd</p> |
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| <p>WEFUNDER Portfolio, LLC<br/>c/o Cogency Global Inc.<br/>850 New Burton Road, Suite 201<br/>Dover, DE 19904,</p> <p>WEFUNDER SPV, LLC<br/>c/o Cogency Global Inc.<br/>850 New Burton Road, Suite 201<br/>Dover, DE 19904,</p> <p>BLACKPOOL Group, Inc.<br/>c/o Jonathan CROSS<br/>401 E Las Olas Blvd.<br/>Ste. 1400<br/>Fort Lauderdale, FL 33301,</p> <p>ENVOTEC, a Pakistani web development company paid through Freelancer.com,</p> <p>VENDORCO, whose legal entity name and service address are currently blocked by defendant computer hack from access by defendants UNITED STATES</p> <p>EGM, whose legal entity name and service address are currently blocked by defendant UNITED STATES computer hack from plaintiff access, likely FBI</p> <p>MATCH GROUP, Inc.<br/>Jared Sine<br/>Chief Business Affairs &amp; Legal Officer<br/>8750 N. Central Expressway, Suite 1400<br/>Dallas, TX 75231,</p> <p>BUMBLE Inc.<br/>1105 W 41st Street</p> | <p>c/o Steven N Kurtz, Esq.<br/>15303 Ventura Blvd, Ste 1650<br/>Sherman Oaks, CA 91403,</p> <p>SOLE SOURCE Capital LLC<br/>c/o: The Corporation Trust Company<br/>Corporation Trust Center<br/>1209 Orange St<br/>Wilmington DE 19801,<br/>ADAMSON Brothers LLC<br/>c/o: Legalinc Corporate Services Inc.<br/>651 N Broad St Ste 201<br/>Middletown DE 19709,</p> <p>ADAMSON Brothers, LLC<br/>c/o Andy ALTAHAWI<br/>205D Chubb Ave Ste 240<br/>Lyndhurst, NJ 07071,</p> <p>ADAMSON Brothers Corp<br/>c/o Andy ALTAHAWI<br/>116 Scarlet Oak Lane<br/>Paramus, NJ 07652,</p> <p>ADAMSON Brothers Inc<br/>c/o Andy ALTAHAWI<br/>2423 SW 147th Ave #706<br/>Miami, FL 33185,</p> <p>ADAMSON Brothers Inc<br/>c/o Andy ALTAHAWI<br/>12 N State Rt 17<br/>Paramus, NJ 07652-2644,</p> <p>ADAMSON Brothers, Inc.<br/>c/o Delaware Corporations LLC<br/>1000 N. West St., Ste 1501<br/>Wilmington, DE 19801,</p> <p>ADAMSON Brothers<br/>Financial Corp</p> | <p>Room 201, Building G,<br/>Shunde Creative Industrial Park, No#41 Dailiang Feng Xiang Road, Shunde District FoShan City, GuangDong, PRC 528300,</p> <p>EGM, whose legal entity name and service address are currently blocked by defendant UNITED STATES computer hack from access by Defendants,</p> <p>Vishal PATEL, MD<br/>One Hudson Medical Associates, LLC<br/>235 Old River Road<br/>Edgewater, NJ 07020</p> <p>Michael SCIARRA, DO<br/>Riverview Gastroenterology Limited Liability Company<br/>300 Midtown Drive<br/>Beaufort, South Carolina 29906</p> <p>Luis M. ASTUDILLO, MD<br/>Northern New Jersey Cardiology Associates, P.A.<br/>7650 River Rd Ste 300<br/>North Bergen, NJ 07047,</p> <p>RANCH CREEK PARTNERS, LLC<br/>c/o JD Kritser<br/>19020 N.E. 84th St.<br/>Redmond, WA 98053,</p> <p>CROSSROADS FINANCIAL LLC<br/>c/o Lee Haskin, CEO<br/>6001 Broken Sound Pkwy<br/>Suite 620<br/>Boca Raton FL 33487,</p> |
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| Austin, TX 78756, | c/o Harvard Business Services, Inc.<br>16192 Coastal Highway<br>Lewes, DE 19958, |  |
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See also LPEEV65-8 (see note at paragraph 230 to locate document in filed evidence.) The specific roles played by certain of these entities used by unknown police powers departments, agencies, agents, and officers to conceal and spoof their actual entity and personal identities is described in specific context therein. The roles and relationships of other unknown and concealed entities, acting jointly and/or severally, will be specifically identified through the discovery process. See also the table at paragraph 228 for abbreviations commonly used for indexing emails from these and other defendants.

150. John Doe defendants include state and local police powers agencies and departments, public and private entities, groups, associations, and individual persons. Unknown public entities include a variety of governments, their departments, agencies, and special purpose entities in various states and in other nations.

151. Paragraphs 151 through 158 are reserved.

#### **D. Known Entity Defendants, Including Police Powers Cover Operations**

159. Many of the entities identified at the subcounts listed at the end of this paragraph were most probably created by and related to named and unnamed defendants. They are most probably cover entities which have been and are illegally used in bad faith by police powers and intelligence agencies and departments for (i) broad-based illegal general searches, (ii) to disrupt the personal and business affairs of illegally targeted persons and groups including private enterprise, including in interstate commerce, and (iii) to sustain the associated-in-fact enterprise against this class of plaintiffs including, without limitation, the pattern of human trafficking and involuntary servitude acts, violations, and injuries to this class of plaintiffs, including to the Lead

Plaintiff. For this reason, these entities are not individually identified as named defendants upon filing, and instead are subject to discovery for the purpose of determining liability for injuries as they were most probably used by various defendants, FBI, CIA, USMS, and NYPD, to cause and create acts, violations, and injuries to this class of plaintiffs. These entities are named, without limitation, in the following paragraphs in this Complaint:

- i. NSEC-1 through NSEC-4, paragraphs 601-603
- ii. HEXP-5 through HEXP-10, paragraphs 608-613
- iii. RGTS-2 through RGTS-7, RGTS-11 through RGTS-17 paragraphs 622-627, 631-637
- iv. RICO-1 through RICO-55, paragraphs 639-693

160. Albertsons Companies, Inc. through its wholly owned subsidiary(ies) ACME MARKETS, Inc. 1013755 and/or ACME MARKETS, Inc. 2112922, (ACME MARKETS herein) is a corporation with a retail location at 481 River Road, Edgewater, NJ. Its retail location was used to supply spoiled refrigerated foods to Lead Plaintiff in various states, including spoiled milk, spoiled produce, and spoiled prepared meat products. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

161. WALMART (China) Investment Co., Ltd., Bentonville, AR headquarters, personnel, and email were used by defendants as part of a series of interstate sales and contract frauds against Lead Plaintiff. Defendant engaged with Lead Plaintiff in their fraudulent role as

part of defendant UNITED STATES illegal BRMT, rights, and racketeering conspiracy.

Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

162. WALMART Inc., Bentonville, AR headquarters, personnel, and email were used by defendants as part of a series of interstate sales and contract frauds against Lead Plaintiff. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

163. COSTCO Wholesale Corporation headquarters, personnel, and email were used by defendants, including HUSKEY and WALKER, as part of a series of interstate sales and contract frauds against Lead Plaintiff. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

164. The KROGER Company, Blue Vine, OH offices, personnel, and email were used by defendants, including KREMPEL, MERCED, (organic produce procurement for Arizona stores) and Will Zimmerman (organic beef procurement), as part of a series of interstate sales

and contract frauds against Lead Plaintiff. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

165. PPG Industries Inc. headquarters, personnel, and email were used by defendants as part of a series of interstate sales and contract frauds (perpetrated during Lead Plaintiff's fraudulent employment and human trafficking by ESTABLISH and ROSENBERG by FBI) against Lead Plaintiff. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

166. ESTABLISH Inc. human trafficked and employed Lead Plaintiff in New Jersey, and on false projects at defendant PPG Industries Inc., Pittsburgh, PA, and at Clipper Windpower in Carpinteria, CA and Cedar Rapids, IA. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES BRMT, rights, and racketeering conspiracy, specifically involving, without limitation, ROSENBERG (FBI), ROSS, MCDONALD, KOVONUK, PANKOWSKI. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.



167. INSIGHT NETWORK Spain is a corporation with offices in Spain. Its officers, including Don KEISER, personnel, and email addresses were used to present and conduct financing and contract frauds and other acts, including in-person meetings, wireline meetings, actions, and email correspondence, to interfere in interstate commerce. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES illegal BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

168. Technology Sales Leads, Inc., (TSL) Boston, MA headquarters, personnel, and email were used by defendants as part of a series of interstate sales and contract frauds against Lead Plaintiff. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES illegal BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

169. LOEB & LOEB, LLP headquarters, personnel, and email were used by defendants as part of a series of interstate financing and contract frauds against Lead Plaintiff. Defendant engaged with Lead Plaintiff in their fraudulent role as part of Defendant UNITED STATES BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, as a bad faith actor and under

fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

170. Daniel WEINER, an attorney licensed in New York, knowingly engaged in mispersonation by misrepresenting himself as an employee of ARLON GROUP LLC. ARLON GROUP was supposedly a subsidiary which was formed to invest the proceeds of the sale of Continental Grain Company headquartered in New York, New York. ARLON GROUP email accounts were used by this Defendant as part of a series of interstate financing and contract frauds against Lead Plaintiff. On knowledge and belief, WEINER was actually the Chairman of the Litigation Department at HUGHES HUBBARD and REED, New York, NY misrepresenting himself as an ARLON GROUP employee. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

171. Raymond F. SULLIVAN, LLC, Attorney, was introduced by Charles JACKSON, allegedly a now deceased alumni of defendant CIA and the brother of Attorney General Janet Reno. As allegedly a former investigator for defendant DEPARTMENT OF HOMELAND SECURITY (DHS) Customs and Border Protection, SULLIVAN used email, phone, and in-person meetings to functionally provided intelligence to defendant UNITED STATES on interstate commercial activities and on personal information provided by Lead Plaintiff as an involuntary subject of the BRMT program operated by this Defendant at all times throughout. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED

STATES BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

172. TRADEKEY.COM is an entity allegedly based in Pakistan doing business in the United States through ORBIT TECHNOLOGIES LLC, 264 Hemlock Terrace, Teaneck, NJ 07666. Its members, personnel, and email addresses were used to present and conduct sales and marketing frauds and other acts, including wireline meetings, actions, and email correspondence, to interfere in interstate commerce. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

173. WEBLINK.IN Pvt. Ltd. Is a limited company in New Delhi, India with offices at 33 and 33A Rama Road, Industrial Area, Shivaji Marg, New Delhi, India. Its members, personnel, and email addresses were used to present and conduct sales and marketing frauds and other acts, including wireline meetings, actions, and email correspondence, to interfere in interstate commerce. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

174. Vishal PATEL, a physician in Edgewater, NJ, and most likely an employee of defendant UNITED STATES, identified here in his personal and professional capacities practicing in One Hudson Medical Associates, LLC, acted against the best medical interests of the Lead Plaintiff during 2019 through 2023. PATEL participated in a pattern intended as a programmed medical collapse of the Lead Plaintiff in 2022-2023. In doing so, PATEL acted well outside the ethical and legal role of a medical doctor. PATEL knowingly perpetuated Lead Plaintiff's involuntary servitude and adverse medical outcomes by his actions. Defendant, in his personal capacity as a bad faith actor and under fraudulent concealment, acted well outside the scope of authority and best practices of a medical doctor, and acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

175. Michael SCIARRA, a gastroenterologist and physician in Edgewater, NJ, and most likely an employee of defendant UNITED STATES, identified here in his personal and professional capacity practicing in Riverview Gastroenterology Limited Liability Company, acted together with other medical professionals in his medical practice against the best medical interests of the Lead Plaintiff during 2019 through 2021. SCIARRA participated in a scheme to create the circumstances for a lethality attempt in April 2021 at Palisades Medical Center in North Bergen, NJ, likely specifically executed by CIA using the illegal BRMT device remotely. In doing so, SCIARRA acted well outside the ethical and legal role of a medical doctor. SCIARRA knowingly perpetuated Lead Plaintiff's involuntary servitude and adverse medical outcomes by his actions. Defendant, in his personal capacity as a bad faith actor and under fraudulent concealment, acted well outside the scope of authority and best practices of a medical doctor, and acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

176. Luis ASTUDILLO, a cardiologist and physician in North Bergen, NJ, and most likely an employee of defendant UNITED STATES, identified here in his personal and professional capacities while in Northern New Jersey Cardiology Associates, P.A., acted against the best medical interests of the Lead Plaintiff during 2021 through 2023. ASTUDILLO participated in a pattern intended as a programmed medical collapse of the Lead Plaintiff between April 2021 through October 2023. In doing so, ASTUDILLO acted well outside the ethical and legal role of a medical doctor. ASTUDILLO knowingly perpetuated Lead Plaintiff's involuntary servitude and adverse medical outcomes by his actions. Defendant, in his personal capacity as a bad faith actor and under fraudulent concealment, acted well outside the scope of authority and best practices of a medical doctor, and acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

177. MATCH GROUP, Inc. is a corporation operating dating sites used by Lead Plaintiff, including Match.com, Tinder, BlackPeopleMeet, Plenty Of Fish, and Hinge. Its website, personnel, and email addresses have been and are used to present and conduct sales and marketing frauds and other acts, including online communications, arranged meetings, actions, and email correspondence, to interfere in interstate commerce, and to defraud the Lead Plaintiff with fraudulent police powers dates intended to isolate, restrain and entrap the Lead Plaintiff and deprive him of the valid exercise of his constitutional rights including, without limitation of privacy, of free speech and free association with other members of the general public. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, as a bad faith actor and under

fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

178. BUMBLE Inc. operates bumble.com, a dating site used by Lead Plaintiff. Its website, personnel, and email addresses have been and are used to present and conduct sales and marketing frauds and other acts, including online communications, arranged meetings, actions, and email correspondence, to interfere in interstate commerce, and to defraud the Lead Plaintiff with fraudulent police powers dates intended to isolate, restrain and entrap the Lead Plaintiff and deprive him of the valid exercise of his constitutional rights including, without limitation of privacy, of free speech and free association with other members of the general public. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

179. John Doe defendants include public and private entities, groups, associations, and individual persons. Unknown public entities include a variety of governments, their departments, agencies, and special purpose entities in various states and in other nations.

180. Paragraphs 180 through 210 are reserved.

**E. Individual Defendants, Including John Does, and John Does Acting Outside Official Capacity, In Bad Faith Acts Performed Under Fraudulent Concealment**

211. Stephen BREYER, a former Supreme Court Associate Justice, identified here in his personal capacity, acted in his roles as fraudulent elder Snow, and as Jack Sackville-West. While employed by the UNITED STATES, most probably ARMY or CIA, he directed the illegal BRMT program focused on Lead Plaintiff from age 12 and on his family of origin, and most

probably against other extended family members then residing in the region, from Kent, WA while posing as an elder in Lead Plaintiff's family's Quaker based church group by hosting fraudulent Sunday home religious services beginning around June 1970, a few weeks after the mid-April death of Lead Plaintiff's sister Sandra from an aspirin-induced fatal Reye Syndrome at age 11; then from Spokane, WA beginning in 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 at paragraph 419.

BREYER engaged in bad faith acts and harmed Lead Plaintiff through his participation in defendant UNITED STATES' illegal BRMT and racketeering program. Defendant hosted Lead Plaintiff and family members at his apparent Kent, WA farm in 1970-1973, then hosted Lead Plaintiff at 1424 South Maple Street, Spokane, Washington residence from at least 1974-1980 as part of defendant UNITED STATES BRMT, rights, and racketeering conspiracy. BREYER would later go on to write and publish Active Liberty in 2005. Lead Plaintiff and THORPE had developed a software scheduling system (ActivLabor, 1983-84) as a result of a consulting project which occurred in conjunction with Queen Elizabeth II's 1983 visit to the Westin Hotel in Seattle, WA, a national security event into which ZOULAS inculcated Lead Plaintiff. Others from Deloitte Seattle joined the project including, without limitation, THORPE, HEATHCOTE, and LEMMON, who worked with Westin client personnel SPADONI, TREADWAY, ASTENGO. Lead Plaintiff had named the software scheduling system ActivLabor, for the primary function it served as intended to be used in hotel operations. BREYER's wife was reportedly a British national from a leading family in Great Britain. While not dispositive, these types of naming rhymes (ActivLabor, Active Liberty) and cultural tie-ins (Breyer family as US and UK husband and wife; UK's Queen Elizabeth II visited the Seattle Westin where Lead

Plaintiff had previously worked on the prototype for the similarly software project) are consistent with now familiar tradecraft rhymes which federal undercover and intelligence operations often echo as this complaint demonstrates. BREYER was specifically joined in this conspiracy by unknown persons posing as his wife, and Laura Lynn SNOW (daughter) in 1970-1973; then by Dorothy SACKVILLE-WEST, “Skip” legal name unknown SACKVILLE-WEST, Richard SACKVILLE-WEST, David SACKVILLE-WEST, Laurie Sackville-West, fka wife of David Sackville-West (DOLAN herein), Robert SACKVILLE-WEST, Karen SACKVILLE-WEST (other plausible identities at paragraph 717), William SACKVILLE-WEST, and James SACKVILLE-WEST, all while posing as related by marriage and/or blood to Jack Sackville-West (BREYER) beginning in Fall 1974. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES illegal BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff’s involuntary servitude by actions and failures to act. Defendant, in his personal capacity as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and other unidentified plaintiffs.

212. Andrew WEISSMANN, (WEISSMAN herein) a former FBI and DOJ official, is identified here in his personal capacity. While employed by the FBI engaged in bad faith acts, WEISSMAN harmed Lead Plaintiff through his participation in defendant UNITED STATES’ illegal BRMT and racketeering program. Defendant engaged with Lead Plaintiff in his roles as PCC General Manager and Board member of NutraSource from approximately 1983-1986 as part of defendant UNITED STATES BRMT, rights, and racketeering conspiracy. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES illegal BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead



Plaintiff's involuntary servitude by actions and failures to act. Defendant, in his personal capacity as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and other unidentified plaintiffs.

213. Charles "Chuck" ROSENBERG (FBI) identified here in his personal capacity while employed by FBI, engaged in bad faith acts, acted in his undercover role Chuck LeFevre (ROSENBERG), CEO of NutraSource, Seattle, Washington which illegally spied in Pacific Northwest food cooperatives while he resided in Washington state in the 1980s, and as William Drumm, supposedly a resident of NJ and General Manager of ESTABLISH, Fort Lee, NJ, but actually a US Attorney acting outside the scope of his employment, acted individually and in conspiracy with others in fraudulently misrepresenting himself and others as authentic officers, employers, and fellow employees of Lead Plaintiff at ESTABLISH, Inc and fraudulently presented project sales, project consulting services, and corporate offices, plants and other facilities, in the illegal human trafficking, fraudulent employment, forced labor, illegal termination, and thefts of commissions and compensation against Lead Plaintiff together with ROSS, and used wire and email fraud, interstate and international travel in the furtherance of their pattern of human trafficking, forced labor, and other myriad frauds in interstate commerce, including inculcation of foreign police powers and intelligence services as part of defendant UNITED STATES BRMT, rights, and racketeering conspiracy. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES illegal BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant in his personal capacity as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and other unidentified plaintiffs.

213A. David Reichert, whose address is known to USMS, identified here in his personal capacity while employed by defendant KCSD, engaged in bad faith acts as an officer and as Sheriff of defendant KCSD. Reichert directed and conspired with co-defendants including, without limitation, with subordinate Gregroy R. Boyle, the first and second former husband of Lynne, who was Lead Plaintiff's romantic partner and spouse from 1979-1988, to fraudulently conceal systematic patterns of violations of constitutional rights, programmed destruction of families and private enterprises in systematic associated-in-fact enterprise patterns of racketeering acts, and to conceal the wrongful roles of police powers and governmental employees acting outside their scope of authority in bad faith acts against Lead Plaintiff and other plaintiffs of this class. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES illegal BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, in his personal capacity as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and other unidentified plaintiffs.

214. William BURNS, identified here in his personal capacity while employed by the United States, engaged in bad faith acts. BURNS is Director, Central Intelligence Agency headquartered in Vienna, VA. BURNS was formerly known as Patrick Heffron (BURNS), an OB/GYN physician who practiced in Kirkland, Washington, and while in that identity was directly and personally involved in defendant UNITED STATES' illegal BRMT medical experimentation on humans and in the cover-up related injuries committed in interstate commerce against Lead Plaintiff from at least 1986 to 1992. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES illegal BRMT, rights,

and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, in his personal capacity as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and other unidentified plaintiffs.

215. Roger STONE, identified here in his personal capacity while employed by the United States, engaged in bad faith acts, while employed directly or under contract by defendant Central Intelligence Agency headquartered in Vienna, VA. STONE was formerly known as David P. Moller, was a consulting Manager at Deloitte Seattle during the pendency of the South Africa Banking System ATM design and implementation project with Boeing for defendant CIA, then became CEO of LazerSoft where he employed Lead Plaintiff as CFO in 1986 in Seattle and Bothell, WA. While in those identities, STONE was directly and personally involved in human trafficking, as part of defendant UNITED STATES BRMT, rights, and racketeering conspiracy including, without limitation, illegal BRMT medical experimentation on humans and in the cover-up related to acts, violations, and injuries committed by defendants, including in interstate commerce, against Lead Plaintiff during 1983 to 1989. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES illegal BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, in his personal capacity as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and other unidentified plaintiffs.

216. Lisa RUBIN (FBI), identified here in her personal capacity, fka Michelle Yarbrough while posing as a stepbrother of Jeanette, acted in conspiracy with defendant UNITED STATES, including ARMY, CIA, BURNS, and others, to sustain a systematically compromised romantic

interest and marriage of Lead Plaintiff to Jeanette, his second wife. RUBIN, while an FBI agent, and her family members including minor children, were directly involved in sustaining the myth of a Yarbrough extended family relationship with Lead Plaintiff throughout the coerced and contrived relationship used by CIA and ARMY to conduct human experiments on Lead Plaintiff, second wife Jeanette, and stepson Bryce. RUBIN knowingly perpetuated Lead Plaintiff's involuntary servitude by her actions. Defendant, in her personal capacity as a bad faith actor and under fraudulent concealment, acted well outside the scope of authority of an FBI agent, as defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES illegal BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, in his personal capacity as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and other unidentified plaintiffs.

217. Alexander VINDMAN, identified here in his personal capacity, fka Paul Yarbrough while posing as a stepbrother of Jeanette. VINDMAN, posing as an Air Force officer and engineering manager on the Boeing AWACS procurement program while an ARMY officer, and his family members including two minor children, were directly involved in sustaining the myth of a family relationship with Lead Plaintiff throughout the coerced and contrived relationship used by CIA and ARMY to conduct human experiments on Lead Plaintiff, second wife Jeanette, and stepson Bryce. VINDMAN knowingly perpetuated Lead Plaintiff's involuntary servitude by his actions as part of defendant UNITED STATES BRMT, rights, and racketeering conspiracy. Defendant, in his personal capacity as a bad faith actor and under fraudulent concealment, acted well outside the scope of authority of a member of the US military in violation of, among other things, posse comitatus law, and acted jointly with other defendants and acted severally to harm

Lead Plaintiff and other unidentified plaintiffs as defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES illegal BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, in his personal capacity as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and other unidentified plaintiffs.

218. Ari MELBER, identified here in his personal capacity, fka Wes Lewis while posing as related by marriage to Theresa, a half-sister of Jeanette, while an FBI agent, and his family members by marriage including two minor children, were directly involved in sustaining the myth of a family relationship with Lead Plaintiff throughout the coerced and contrived relationship used by CIA and ARMY to conduct human experiments on Lead Plaintiff, second wife Jeanette, and stepson Bryce. MELBER knowingly perpetuated Lead Plaintiff's involuntary servitude by his actions as part of defendant UNITED STATES BRMT, rights, and racketeering conspiracy. Defendant, in his personal capacity as a bad faith actor and under fraudulent concealment, acted well outside the scope of authority of an FBI agent, as defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES illegal BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, in his personal capacity as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and other unidentified plaintiffs.

218A. Robert MUELLER, whose address is known to USMS and FBI, identified here in his personal capacity while employed by the United States, engaged in bad faith acts as a US Attorney, and as Director of defendant FBI from 2001-2013. MUELLER directed and conspired

with co-defendants to fraudulently conceal systematic patterns of violations of constitutional rights, programmed destruction of families and private enterprises in systematic associated-in-fact enterprise patterns of racketeering acts, and to conceal the wrongful roles of federal prosecutors acting out of scope of authority against Lead Plaintiff and other plaintiffs of this class. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES illegal BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, in his personal capacity as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and most probably other unidentified plaintiffs.

219. Leslie CALDWELL, while assigned to Seattle, Washington by DOJ, identified here in her personal capacity, is a former DOJ prosecutor in the US Attorney's Office for Northern California, while reporting there to Robert MUELLER, who was later FBI Director. CALDWELL, who was later Assistant Attorney General for the Criminal Division of DOJ, pretended to be an intellectual property attorney at the law firm Seed and Berry (now Seed IP), Seattle, Washington, representing the Lead Plaintiff's business, Allegent, LLC in 2004, in co-ownership with PRAY (actually FBI or USMS agency funds funneled indirectly through PRAY to sustain secret co-ownership). While in this role, CALDWELL participated directly in a complex illegal FBI business wrecking and financial entrapment scheme against the Lead Plaintiff which was intended, among other things, to avoid exposing the federal agent co-owner PRAY of Lead Plaintiff's private enterprise as its field operative. CALDWELL knowingly perpetuated Lead Plaintiff's involuntary servitude by her actions as part of defendant UNITED STATES illegal BRMT, rights, and racketeering conspiracy as defendant, in her personal

capacity as a bad faith actor and under fraudulent concealment, acted well outside the scope of authority of a federal prosecutor, Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES illegal BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, in his personal capacity as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and other unidentified plaintiffs.

220. Joseph ARPAIO, both as MARICOPA SHERIFF and as an individual in his personal capacity, acted severally and in conspiracy with others, falsely personated a fresh produce industry consultant, Greg CROSSGROVE, and used email, phone and in-person meetings, and organized a team of false employees for Lead Plaintiff's companies engaged in interstate commercialization of organic produce, organic beef, and other products to major retailers, including defendants COSTCO Wholesale Corporation, WALMART, Inc and subsidiaries, and The KROGER Company and subsidiaries, among others. Defendant engaged with Lead Plaintiff in his fraudulent role as a consultant to Winnett Perico, Inc., (Winnett) as part of defendant UNITED STATES illegal BRMT, rights, and racketeering conspiracy. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES illegal BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, in his personal capacity as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and other unidentified plaintiffs.

221. Neal KATYAL, employed by DOJ or ARMY, identified here in his personal capacity, formerly known as Shawn Morrissey while posing as a high school student, engaged in

bad faith acts at the small and specifically carved-out Decatur High School, Federal Way, WA attended by Lead Plaintiff. While in his undercover role, KATYAL acted individually and in conspiracy with others in fraudulently misrepresenting himself and others as authentic fellow students of Lead Plaintiff at Decatur High School, Federal Way, WA, befriended Lead Plaintiff and engaged in coercive acts and civil rights violations, fraudulently participating in the illegal human trafficking, biomedical abuse of human subjects, and other illegal acts against Lead Plaintiff together with an unknown agent fka Thomas Grady and other defendant FBI, ARMY, and CIA student posers of defendant UNITED STATES, and used wire and email fraud, and interstate travel in the furtherance of their pattern of human trafficking, forced labor, and other myriad frauds in interstate commerce. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES illegal BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, in his personal capacity as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and other unidentified plaintiffs.

222. Thomas KEENE, while a Bloomberg Media network television anchor, identified here in his personal capacity, fka Michael Callahan, while posing as an investment banker at DOMINICK & DICKERMAN LLC (DOMINICK, DD) during an interstate commerce financing effort by Lead Plaintiff for his Winnett startup, engaged in civil rights and racketeering violations, fraudulently participating in the illegal human trafficking, biomedical abuse of human subjects, and other illegal acts against Lead Plaintiff, together with GROSS, CARDONE, and other FBI, ARMY, and CIA personnel of defendant UNITED STATES and its co-conspirator defendants, and used wire and email fraud, and interstate travel in the furtherance of



their pattern of human trafficking, forced labor, and other myriad frauds in interstate commerce, all as part of defendant UNITED STATES BRMT, rights, and racketeering conspiracy. KEENE knowingly perpetuated Lead Plaintiff's involuntary servitude by his actions as part of defendant UNITED STATES BRMT, rights, and racketeering conspiracy. Defendant, in his personal capacity as a bad faith actor and under fraudulent concealment, acted well outside the scope of authority of a professional media employee and/or private citizen in racketeering acts as defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES illegal BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, in his personal capacity as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and other unidentified plaintiffs.

223. Stephanie Clifford (MODDERMAN), believed to be a resident of New York and Florida, whose address is known to the District Attorney for Manhattan, New York City, NY. MODDERMAN is an adult film actor who posed in 2008 as Marinka MODDERMAN, from a MATCH GROUP website, match.com, which website, or the spoofing of same as corruptly obstructed and administered for the benefit of defendants FBI (ROSENBERG) and CIA (BURNS) during the 2007-2008 human trafficking from Boston, MA to Fort Lee, NJ and fraudulent employment at ESTABLISH, and the defamation and reputational smear campaign against Lead Plaintiff. MODDERMAN was presented as the doting mother of three children for the purpose of orchestrating a publicly available video sex scene smear performed without knowledge or consent in the Cliffside Park, NJ apartment rented by Lead Plaintiff from CHALOM (USMS) for the conduct of this illegal and publicly corrupt operation by defendants DOJ, FBI, USMS, and CIA in 2007-2008. MODDERMAN knowingly perpetuated Lead

Plaintiff's involuntary servitude and damaged his public reputation by her actions as part of defendant UNITED STATES BRMT, rights, and racketeering conspiracy. Defendant, in her personal capacity as a bad faith actor and under fraudulent concealment acted to defame, jointly and severally to harm Lead Plaintiff. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES illegal BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, in her personal capacity as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff.

224. Norelle Dean (GIA), a resident of New York posed in 2019-2021 as Gia Shakur and alternatively as Tina Rinehart, from a MATCH GROUP website, which website, or the spoofing of same as corruptly obstructed and administered for the benefit of defendants including, without limitation, FBI and CIA during the 2019-2021 series of dates and a fraudulent relationship with Lead Plaintiff. GIA was presented as a college student engaged in literary and artistic pursuits and poetry for the purpose of orchestrating a fraudulent relationship and videographed sex scenes smear performed without Lead Plaintiff's knowledge or consent in the Edgewater, NJ apartment rented by Lead Plaintiff from a USMS cutout entity for the conduct of this illegal and publicly corrupt operation including, without limitation, by defendants DOJ, FBI, USMS, and CIA as they have and do continue from 2018 when Lead Plaintiff was trafficked by defendants DOJ, FBI, USMS into the midst of the Senator Menezes public corruption investigation (paragraphs 624 RGTS-4, 648 RICO-10). GIA knowingly perpetuated Lead Plaintiff's involuntary servitude and damaged his public reputation by her actions as part of defendant UNITED STATES BRMT, rights, and racketeering conspiracy. Defendant, in her personal capacity as a bad faith actor and under fraudulent concealment, acted against the

interests and reputation, and engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES illegal BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, in his personal capacity as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and other unidentified plaintiffs.

225. Anthony FAUCI, a resident of Maryland, whose address is known to USMS, while known to Lead Plaintiff as Larry R Cook, was an illegal BRMT bioweapon and bioweapon delivery system program executive identified here in his personal capacity who, while employed by the United States, engaged in bad faith acts. FAUCI operated as Lead Plaintiff's employer at CNA Industrial Engineering, Bellevue, WA from November 1996 to September 2006. FAUCI is known to have operated in this role from approximately the mid-1990s into the 2000s, which illegal operations incorporated racketeering acts, and illegal BRMT brain hijackings to and including extreme mental biochemical torture and coercive psychological operations, which led to suicide ideations by the early 2000s, in the aftermath of 9/11/2001 retaliatory attack during a period when torture was a documented practice in defendant CIA operations (paragraphs 336-340). While in that Larry R. Cook identity, FAUCI was directly and personally involved in defendant UNITED STATES' illegal BRMT medical experimentation on humans and in the cover-up of related injuries committed in interstate commerce against Lead Plaintiff. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES illegal BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, in his personal

capacity as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and other unidentified plaintiffs.

225A. Marc CHALOM, a resident of New Jersey, acted and/or posed as the landlord of the 282 Palisade Avenue, Cliffside Park, NJ, apartment building where Lead Plaintiff was human trafficked and lived from August 2007 to October 1, 2010, while he was fraudulently employed at Establish in Fort Lee, NJ by defendants ROSENBERG and ROSS until June 2008. Lead Plaintiff was tortured and subjected to public humiliation and sexual abuse at this Cliffside Park, NJ location before being forced by CHALOM to leave in October 2010 to be kidnapped without due process into Bergen Regional Medical Center locked behavioral health wards in Paramus, NJ, after Lead Plaintiff filed federal civil rights litigation in the federal District of New Jersey in June 2010. CHALOM also closely resembled, and may have been directly involved in prior human trafficking, in a fraudulent employment opportunity presented in on San Juan Island at a prismatic lens development startup in 1989 as unwitting Lead Plaintiff was reviewing employment options in the greater Western Washington area as an element of defendant FBI, CIA, USMS, DOJ, UNITED STATES involuntary servitude in their associated-in-fact enterprise pattern of racketeering acts with other governmental defendants in Washington state including, without limitation, defendants KCSD and WASH. Defendant engaged with Lead Plaintiff in their fraudulent role as part of defendant UNITED STATES illegal BRMT, rights, and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by actions and failures to act. Defendant, in his personal capacity as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and severally acted to harm Lead Plaintiff and other unidentified plaintiffs.

226. Unknown government agents, officers, and employees, currently or formerly employed by governmental defendants in police powers and other government operations, identified here in their personal capacities, some of whom are identified by their known cover and current public names in the caption, and others as John Doe Police Powers defendants of unknown number. These unidentified defendants include, without limitation, police powers officers, agents, employees, and officials of named and not yet identified defendant agencies and departments, including of general government, as well as of police unions, and related private entities, groups, associations, and individual persons, including, without limitation, unknown officers, agents, contractors, successors and assigns of governmental entities who are also currently unknown to be identified during discovery. Defendants knowingly perpetuated violations of constitutional rights of these plaintiffs, including, without limitation, Lead Plaintiff, including their rights under the *First, Third, Fourth, Fifth, Eighth, Ninth, Thirteenth, and Fourteenth* Amendments by their actions and failures to act as part of defendant UNITED STATES BRMT, rights, and racketeering conspiracy. Defendants, in their personal capacity as bad faith actors and under fraudulent concealment, exceeded their legal authority under law, acted jointly with other defendants and acted severally to harm Lead Plaintiff and most probably other unidentified plaintiffs under color of law. These defendants include, without limitation, persons using the following identities at the time of their contact with Lead Plaintiff:

**Table: Unknown Persons - Government Agents, Press, Media, Entertainment, And Other Persons Who Have Been Granted Access To The Otherwise Inaccessible Lead Plaintiff By Defendant UNITED STATES and Other Police Powers**

|  |   |  |
|--|---|--|
| Other Unknown Government Officers, Agents, and Employees, while known as:<br><br>Dorothy SACKVILLE-WEST, and | David KELLER,<br>David WYLY,<br>DEAN T. SMITH (Auburn, CA),<br>Dewey TURNER,<br>Don KEISER, | Michael STRASSER,<br>Michael BABCOCK,<br>Michael LARSON,<br>Orland HOWARD,<br>Dr. Paul SHAFFER,<br>PAUL SMITH, |
|--|---|--|

|   |  |   |
|---|--|---|
| <p>“Skip” legal name unknown<br/>SACKVILLE-WEST, and<br/>Richard SACKVILLE-<br/>WEST, and<br/>David SACKVILLE-WEST,<br/>and<br/>Robert SACKVILLE-WEST,<br/>and<br/>Karen SACKVILLE-WEST,<br/>and<br/>William SACKVILLE-<br/>WEST, and<br/>James SACKVILLE-WEST,<br/>all while posing as related by<br/>marriage and/or blood to Jack<br/>Sackville-West (defendant<br/>BREYER),</p> <p>Akshay SETH,<br/>AL THANI, Sheikh Jassim<br/>Bin Hamad Bin Jabor,<br/>Alice CHENG,<br/>Andrew ALTAHAWI,<br/>Andrew CARDONE,<br/>Andrew KUNSAK,<br/>Arthur THOMPSON,<br/>Bob HUSKEY,<br/>Brad KUMIN,<br/>Bradford ROSSI,<br/>Brandon HUTCHISON,<br/>Bruce BLITCH,<br/>Charles JACKSON,<br/>Chris CANCHOLA,<br/>Conrad ROSS,<br/>Dana SMITH,<br/>Daniel KREWSON,<br/>Daniel LONERGAN,<br/>Daniel WEINER,<br/>Darrell C. PRAY,<br/>David Choate HUGHES,</p> | <p>Dorothy FULLER,<br/>Doug PETERSEN,<br/>Eric GALKIN,<br/>Frank MAUGHAN,<br/>Gary JACK,<br/>Gerald CORNWELL,<br/>Gerald NEWMAN,<br/>Glen GARRISON,<br/>Greg LINS,<br/>GREG SMITH,<br/>Gwen HEATHCOTE,<br/>H. Paul LOWBER,<br/>Ibrahim ABDELSAYED,<br/>Jacob KREMPEL,<br/>James CHRISTENSEN<br/>Jason PANKOWSKI,<br/>Jason WASEMAN,<br/>Jasper VAN BRAKEL,<br/>Jay CARTER,<br/>Jim RHODES,<br/>Joanne LABELLE,<br/>Joel GOTTESMAN,<br/>John ARTUSO,<br/>John GOODMAN,<br/>John VANGCHHIA,<br/>Jon NICKLESS,<br/>Jonathan CROSS,<br/>Jose MERCED,<br/>Kim EPSKAMP,<br/>Kristine J. VOLK,<br/>Larry R. COOK,<br/>Laura AKOTO,<br/>Laura Lynn SNOW,<br/>Lee ZUKER,<br/>Lino BELLI,<br/>Lori ALVAREZ,<br/>Marc CHALOM,<br/>Mark GROSS,<br/>Michael CASTRO,<br/>Michael HENDERSON,<br/>Michael KURGAN,<br/>Michael MAGGARD<br/>Michael ROZNOWSKI,</p> | <p>Peter GRUBSTEIN,<br/>Peter LEBLOND,<br/>Phil DALEUSKI,<br/>Phil LALJI,<br/>Piotr PREGNER,<br/>R. Kent TARPLEY,<br/>Raoul WHEELER,<br/>Ray KOVONUK,<br/>Raymond POON,<br/>Reginald MCGAUGH,<br/>Richard A. MILLER,<br/>Robert BESTWICK,<br/>Robert FINKELSTEIN,<br/>Robert HIBBS,<br/>Robert MANDICH,<br/>Robert MILLER,<br/>Robert POON,<br/>Robert SAUL,<br/>Robert SWAIN,<br/>Robert WHARTON,<br/>Robert ZOOK, Amfac CIO<br/>and later unknown name<br/>while CEO, Zetec, a CNA<br/>client,<br/>Rod PROCTOR,<br/>Ron MCCORMICK,<br/>Ron WILLIAMS,<br/>Sam SANDERS,<br/>Selwyn GORDON,<br/>Stephen WATERS,<br/>Steve MCDONALD,<br/>Steve POINDEXTER,<br/>Susan WALKER,<br/>Tesina PAINTER,<br/>Vito PERILLO,<br/>Walter HABERER, aka<br/>Walter SIMON,<br/>Warren WILKINS,<br/>William REED,<br/>William TARAZEWICH,<br/>Yoshiyuki HIGAKI,<br/>Zach SEASE,<br/>Zoe SCHUMAKER.</p> |
|---|--|---|

See also LPEEV65-8 (see note at paragraph 230 to locate that document in filed evidence.) The specific roles played by certain of these entities used by unknown police powers departments, agencies, agents, and officers to conceal and spoof their actual entity and personal identities is described in specific context therein. The roles and relationships of other unknown and concealed entities, acting jointly and/or severally, will be specifically identified through the discovery process. See also the table at paragraph 228 for abbreviations commonly used for indexing emails from these and other defendants.

227. John Doe defendants of unknown number include other unidentified private entities, groups, associations, and individual persons, including, without limitation, unknown officers, agents, contractors, successors and assigns of governmental entities who are also currently unknown to be identified during discovery. Defendants knowingly perpetuated Lead Plaintiff's involuntary servitude by their actions as part of defendant UNITED STATES illegal BRMT, rights, and racketeering conspiracy. Defendants, in their entity and/or personal capacity as bad faith actors, exceeded their legal authority under law, acted jointly with other defendants, and acted severally to harm Lead Plaintiff and most probably other unidentified plaintiffs under color of law and fraudulent concealment.

228. All defendants are responsible for careful review and answers to all paragraphs. Alternate search terms include, without limitation, the following email abbreviations used interchangeably with the defendant name for the following person and entity defendants:

| DEFENDANT                        | ALTERNATE SEARCH TERM |
|----------------------------------|-----------------------|
| All Winnett Fraudulent Employees | WO TEAM               |
| ALTAHAWI                         | ADAMSON               |
| ARPAIO                           | OLIVER                |
| BESTWICK                         | BA BESTWICK CARDONE   |
| CARDONE                          | BA BESTWICK CARDONE   |
| CARTER                           | LIBERTY               |

|                  |            |
|------------------|------------|
| DC INTERNATIONAL | DC INTL    |
| DOMINICK         | DD         |
| EARLY BIRD       | EB         |
| FOSHAN SHUNDE    | RMC        |
| GROSS            | DD         |
| INSIGHT NETWORKS | INSIGHT    |
| KEENE (CALLAHAN) | DD         |
| KELLER           | LIBERTY    |
| LIBERTY WEST     | LIBERTY    |
| MADISON STREET   | MADISON ST |
| MARICOPA SHERIFF | OLIVER     |
| RAM CONSULTING   | RAM        |
| WALMART          | WMT        |
| WALMART CHINA    | WMT CHINA  |
| WILLIAM REED     | BREED      |
| WILLIAM REED     | REED       |

Note that these abbreviations may be misspelled in email topic lines contained in the evidence tables at paragraphs 600-710. See also the compendium and glossary at LPEE pages 934-1075.

## **NOTICE TO COURT AND DEFENDANTS CONCERNING CONTINUING OBSTRUCTIONS OF JUSTICE BY DEFENDANT UNITED STATES**

229. Defendant UNITED STATES has and does use a continuing technical hack to suppress evidence of its human trafficking, interferences in interstate commerce, in constitutional rights, and other acts, violations, and injuries to Lead Plaintiff (generally related at paragraph 648 RICO-10) in certain email accounts from March 4, 2018 through July 9, 2020. This pattern of suppression of evidence, the September 2023 erasure of his electronic MS-Outlook calendar, and the February 2024 overnight erasure of female dating contact records from his old cell phone, are further to the continuing pattern of racketeering acts of evidence and witness tampering obstructions of justice (18 U.S.C. §§ 1512, 1513) by defendant UNITED STATES as it continues its broad pattern of obstruction, destruction, and tampering documented herein, which accelerated from June 2022 to the present (Interline Exhibit 15, LPEE pages 11645-11672, 11708-11925, 11931-11936, 12146-12244, LPEEV65 documents 2-5, 9, 11-16).





















Defendant UNITED STATES also has and does hack spelling of names, verb tenses, and punctuation marks in this complaint during preparation and has been known to change paragraph references and legal references to statutes to render them meaningless. Lead Plaintiff has and does exercise due care in preparation but cannot be assured of the integrity of each and every element of the text despite due care as a result of this technical hacking. This hacking is consistent with defendant CIA's pattern of practice related to the 2104 Senate Intelligence Committee staff work and its report on torture (paragraphs 336-340), which together with other forms of biomedical and other indirect physical assaults, and with intentional and malicious narrative shaping public humiliations, against these plaintiffs comprise a significant portion of that specific defendant's primary role in this complaint.

230. LPEEV65 document references were forced by defendant UNITED STATES to be substituted for the Bates numbering of evidence beginning in February 2024. This change in the method of identifying evidence was required due to a technical hack of Adobe Acrobat Pro by defendant UNITED STATES from that date which is still continuing. The short description of these documents is in the table below.

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## Table: LPEEV65 Documents Index

-  LPEE V65-1 Audrey Brewer Homicide - Effinger sentenced WW Union-Bulletin 120702
-  LPEEV65-2 Colon Health Diary Addendum 231106 to 240127\_20240127\_0001
-  LPEEV65-3 BRMT Contrived Conduct - Select Examples 2023 240203
-  LPEEV65-4 Dating Apps Obstruction Oct 23 - Jan 24 240202
-  LPEEV65-5 Fake Contrived Blown Events Club Free Time EventBrite 2021-2023 240202
-  LPEEV65-6 BA 5058 D BREWER DDA SELECTED ENTRIES 2007-2015 240202
-  LPEEV65-7 BA 5058 Notice of Duty to Preserve Evidence 220120
-  LPEEV65-8 Police Powers Select Cover And Unknown Individual Roles 230102
-  LPEEV65-9 FBI Ironwood All 230205 230530
-  LPEEV65-10 DC Civil Email Redacted 211012
-  LPEEV65-11 Ltr 221109 SDNY Threats and Assaults Ltr Encl 221109\_Redacted
-  LPEEV65-12 Ltr 230228 SDNY Wire Fraud Intuit Website 230228\_Redacted
-  LPEEV65-13 Ltr 230711 AG SDNY Health Ltr Encl 230711\_Redacted
-  LPEEV65-14 Ltr 230814 SDNY Ltr Encl 230814\_Redacted
-  LPEEV65-15 Ltr 230901 SDNY Ltr Encl 230901\_Redacted
-  LPEEV65-16 Ltr 231004 SDNY Ltr Encl Colon 231004\_Redacted
-  LPEEV65-17 Torture - Compare Psych Physical 240227
-  LPEEV65-18 Fatal Pinter Hack Third Printer 13 months 240308

Paragraphs 231 through 249 are reserved.

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