

## SELECT PROBABLE POLICE POWERS COVER ENTITIES AND PERSONS

### SELECT PROBABLE POLICE POWERS COVER ENTITIES

161. PREFERRED TRUST Company, LLC, Henderson, NV, invested \$100,000 in Winnett Perico, Inc., a company formed by the Lead Plaintiff to conduct interstate commerce in organic agricultural production and sales. The investment was ostensibly made on behalf of DEAN T. SMITH, now presumed to be an officer or agent of defendant UNITED STATES, most probably FBI or perhaps USMS. Its managing member, personnel, and email addresses were used to fraudulently misrepresent itself as the trust agent for DEAN T. SMITH who posed as an accredited investor. PREFERRED TRUST engaged in other fraudulent acts, including wireline meetings, actions, and email correspondence, to interfere in interstate commerce by investing to entrap and entangle the Lead Plaintiff and to prevent legal acts in interstate commerce. Defendant engaged with Lead Plaintiff in their fraudulent role as part of Defendant UNITED STATES BRMT 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. SASHA'S FARM FRESH, whose full legal name and form of organization has never been disclosed to Lead Plaintiff by design of defendant UNITED STATES, invested at least \$5,000 in Winnett Perico, Inc., a company formed by the Lead Plaintiff to conduct interstate commerce in organic agricultural production and sales. The investment was ostensibly made on behalf of DEAN T. SMITH, now presumed to be an officer or agent of defendant UNITED STATES, most probably FBI or perhaps USMS. DEAN T. SMITH, as its managing member or corporate officer, and related email addresses, were used to fraudulently misrepresent itself as an entity controlled by DEAN T. SMITH who posed as an accredited investor. SASHA'S FARM FRESH engaged in other fraudulent acts, including wireline meetings, actions, and email correspondence, to interfere in interstate commerce by investing to entrap and entangle the Lead Plaintiff and to prevent legal acts in interstate commerce. Defendant engaged with Lead Plaintiff in their fraudulent role as part of Defendant UNITED STATES BRMT 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. BA BESTWICK CARDONE GROUP New York City offices, personnel including Robert BESTWICK and Andrew CARDONE, and email addresses were used by Defendants as part of a series of interstate financing and contract frauds against Lead Plaintiff, including fraudulent natural foods symposiums and introduction to other undercover police powers operations, including other FBI undercover posers as BAML (Bank America Merrill Lynch) personnel and to CALLAHAN at DOMINICK & DICKERMAN, and to legal counsel for legal advice regarding transfers of founder's shares to trusts. Defendant engaged with Lead Plaintiff in their fraudulent role as part of Defendant UNITED STATES BRMT and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's human trafficking and involuntary servitude by actions and failures to act, including, without limitation, by its employees and/or contractors CALLAHAN and GROSS. 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. DOMINICK & DICKERMAN LLC New York City offices, personnel, and email were used by Defendants as part of a series of interstate financing and contract frauds against Lead Plaintiff. Defendant engaged

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with Lead Plaintiff in their fraudulent role as part of Defendant UNITED STATES BRMT and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's human trafficking and involuntary servitude by actions and failures to act, including, without limitation, by its employees and/or contractors CALLAHAN and GROSS. 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. WEFUNDER, including all entities listed as Defendants in caption above, 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 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. BLACKPOOL Group, Inc., SHEFFORD & Associates, LLC, SHEFFORD Capital Partners, LLC, The SHEFFORD Group, Inc., which generally shared common personnel as principals and officers, including without limitation, CROSS, 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 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. FRACTAL Advisors LLC is an LLC with offices in KS. Its member ROZNOWSKI, and email address were used to present and conduct financing and contract 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 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. CORNHUSKER Capital is a corporation with offices in NE. Its officers, including MCGAUGH, other personnel, and email addresses were used to present and conduct financing and contract frauds, litigation 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 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.

175. BANCO Advisors, LLC is an LLC with offices in AZ. Its members including ?? SMITH, personnel, and email addresses were used to present and conduct financing, sales, and marketing frauds and other acts, including wireline meetings, actions, and email correspondence, interstate travel and expenses, to interfere in interstate commerce. Defendant engaged with Lead Plaintiff in their fraudulent role as part of Defendant UNITED STATES BRMT 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

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

177. MADISON STREET Capital Advisors, LLC is an LLC with offices in IL. Its members including Charles BOTCHWAY, personnel, and email addresses were used to present and conduct financing and contract 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 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. NEW AMERICA LENDING, LLC is an LLC with offices in IL. Its members including David Choate HUGHES, personnel, and email addresses were used to present and conduct financing, sales, marketing and contract 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 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. RICHARD A. MILLER Consulting, LLC, RAM, is an LLC with offices in PA. Its members, personnel, and email addresses were used to present and conduct financing, sales, marketing, and contract 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 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.

180. SALLYPORT Commercial Finance, LLC is an LLC with offices and/or personnel doing business in CA. Its members, personnel, and email addresses were used to present and conduct financing and contract 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 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.

181. SOLE SOURCE Capital LLC is allegedly an LLC with offices in California, though more probably a cover operation used by FBI Manhattan field office in its collaboration in the elaborate entrapment scheme described at RICO-9 and RICO-10 herein. Its facilities, members including TURNER, ROSSI, personnel, and email addresses were used to present and conduct financing and contract frauds and other acts, including wireline meetings, actions, and email correspondence, interstate travel and expense to interfere in interstate commerce. Defendant engaged with Lead Plaintiff in their fraudulent role as part of Defendant UNITED STATES BRMT 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

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

182. CFO SEARCH, Inc. is allegedly a corporation with an office in Lubbock, Texas, though more probably a cover operation used by FBI Amarillo field office in its collaboration in the elaborate entrapment scheme described at RICO-9 and RICO-10 herein. Its facilities, members including MAGGARD, personnel, and email addresses were used to present and conduct financing, executive search, sales, marketing, and contract frauds and other acts, including wireline meetings, actions, and email correspondence, interstate travel and expense to interfere in interstate commerce. Defendant engaged with Lead Plaintiff in their fraudulent role as part of Defendant UNITED STATES BRMT 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.

183. ADAMSON Brothers Corp is a corporation with offices in NJ and FL; ADAMSON Brothers Inc. is a corporation with offices in NJ and FL; ADAMSON Brothers, Inc. is a corporation with offices in NJ and FL; ADAMSON Brothers Financial Corp is a corporation with offices in NJ and FL; . ADAMSON Brothers LLC is an LLC with offices in NJ and FL; ADAMSON Brothers, LLC is an LLC with offices in NJ and FL. These entities are most likely police powers cover operations which share common officers and/or members including ALTAHAWI, and personnel, and whose email addresses were used to present and conduct financing, 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 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.

184. RANCH CREEK PARTNERS LLC is an LLC with offices in WA. Its managing member J.D. KRITSER, personnel, and email addresses were used to fraudulently misrepresent itself as an interested investor and engage in other fraudulent acts, including wireline meetings, actions, and email correspondence, to interfere in interstate commerce, including with Caviness Beef, Hereford, TX regarding processing operations for foreign buyers allegedly interested in procuring US beef products through Lead Plaintiff's company Sheldon Beef, and through coordinated telephonic conversations ostensibly with John Herring, the retired CEO of a major feedyard operation headquartered in Hereford, TX regarding feigned interest in an investment in Skaar Livestock and Farming near Idaho Falls, ID, which Lead Plaintiff was seriously pursuing using SANDERS as the agent for this transaction. Defendant engaged with Lead Plaintiff in their fraudulent role as part of Defendant UNITED STATES BRMT 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.

185. CAVINESS BEEF (need legal name and form here) is an LLC with offices in Hereford, TX. Its members including ???(son), personnel, and email addresses were used to present and conduct financing and contract 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 and racketeering conspiracy. Defendant knowingly perpetuated Lead

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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.

186. CROSSROADS FINANCIAL LLC is an LLC with offices in FL. Its members, personnel, and email addresses were used to present and conduct financing and contract 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 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.

187. BIBBY Financial Services, Inc. is a corporation with offices in GA. Its offices, officers, personnel, and email addresses were used to present and conduct financing and contract frauds and other acts, including wireline meetings, actions, and email correspondence, interstate travel and expense, to interfere in interstate commerce. Defendant engaged with Lead Plaintiff in their fraudulent role as part of Defendant UNITED STATES BRMT 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.

188. AXIAL Networks, Inc. is a corporation with offices in NY. Its officers, personnel, and email addresses were used to present and conduct financing, sales, and marketing 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 BRMT 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.

190. ENGLEMAN Associates, Inc., formerly known as SOFTSELECT Systems, headquarters, personnel, and email were used by Defendants as part of a series of interstate sales and contract frauds against Lead Plaintiff, and as part of a plan to entrap Lead Plaintiff for providing services in Iran, a country subject to an embargo by Defendant UNITED STATES at the time. Defendant engaged with Lead Plaintiff in their fraudulent role as part of Defendant UNITED STATES BRMT 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.

194. ASSURE GROUP International, LLC is a corporation with offices in MD. Its members including John Vangchhia, 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 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

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

195. ABT Trading Inc. is a corporation with offices in FL. Its officers, 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. Its officers were known at various times as Walter HABERER and Walter SIMON. Defendant engaged with Lead Plaintiff in their fraudulent role as part of Defendant UNITED STATES BRMT 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.

196. DC INTERNATIONAL LLC is an LLC domiciled in WY. Its members including Phil DALEUSKI, 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 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.

197. CONSUMERBASE LLC dba EXACT DATA is an LLC with offices in IL. 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 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.

198. EGM is an entity whose records are currently blocked from access by a defendant computer hack which renders the specific identity name of this defendant inaccessible to the Lead Plaintiff as this Complaint is prepared. Records exist and are listed in an index of emails in the compendium at LP Evidentiary Exhibits page 1074, so this information was deliberately blocked by defendants for fraudulent concealment after the compendium entry was made. Its officers and/or members, personnel, and email addresses were used in interstate commerce 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 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.



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### 210. SELECT PROBABLE POLICE POWERS INDIVIDUAL DEFENDANTS

Most probably a current or former FBI or USMS official, and by his own representation a former freight broker to the Defense Logistics Agency in the greater Pacific Region for ARMY, NAVY, and other military services, while in his role as Mr. DEAN T. SMITH, identified here in his personal capacity, while a resident of Auburn, California, as an individual and acting in concert with others, invested funds allegedly for his own accounts, through his trust accounts, through his entity SASHA'S FARM FRESH, and as a nominee for other unknown persons and entities (most probably all entirely for and by FBI), to perpetrate and perpetuate various investment, lending, financial, wire, email, bank and other financial frauds, as well as sourcing, supply, sales, marketing frauds from 2015 to 2019, and in litigation fraud and misrepresentation from 2019 to 2022 with EVERS, all as bad faith acts and frauds in interstate commerce. DEAN T. SMITH is identified here in his personal capacity. While employed by the United States, engaged in bad faith acts, DEAN T. SMITH acted, violated, and injured Lead Plaintiff through his participation in Defendant UNITED STATES' BRMT and racketeering program. DEAN T. SMITH knowingly perpetuated Lead Plaintiff's involuntary servitude by his actions. 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.

215. Robert SWAIN, identified here in his personal capacity, posed as the owner of the installation shop which installed the cellular telephone equipment box in the trunk of Lead Plaintiff's car, This cellular telephone equipment box concealed a local BRMT device which was remotely triggered in a double homicide attempt against Lead Plaintiff and his first wife, Lynne, near Porteau Cove, British Columbia by CIA in the mid-1980s (paragraph ??). SWAIN, while actually an current or former undercover employee of defendant UNITED STATES, later acted in conspiracy with ARMY, CIA, BURNS, and others to systematically compromise the marital community of Lead Plaintiff and Lynne through their purposeful isolation of Lynne and Lead Plaintiff from each other. SWAIN conspired with others who used Lynne's overtime work schedule in proximity of SWAIN and scheduled extensive travel for Lead Plaintiff to an Amfac Distribution IT project in Folsom, CA, run by Robert ZOOK, another defendant, over eight months in 1985-1986, as part of their conspiracy. While posing as an employee of US West New Vector Group, which also employed Lead Plaintiff's wife Lynne, SWAIN then engaged in an extra-marital affair with Lynne, while she was being manipulated by CIA using its BRMT device to boost oxytocin (commonly considered the "love" hormone) levels during her extended working hours and while on board SWAIN's sailboat. SWAIN then divorced his then wife and, after Lynne's divorce from Lead Plaintiff in late Spring or Summer 1988, married Lynne in late Summer or early Fall 1988. Defendant, in his personal capacity as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and acted severally to harm Lead Plaintiff and most probably other unidentified plaintiffs.

216. Stephen M. WATERS, identified here in his personal capacity while an employee of defendant UNITED STATES, while posing as a contractor to LazerSoft during and after the Lead Plaintiff's employment there, acted in conspiracy with ARMY, CIA, BURNS, and others to introduce a systematically compromised romantic interest, Jeanette Smith, who was most likely compromised by ARMY using threat of prosecution and imprisonment based upon sexual orientation while deliberately entangled for this purpose of threat of prosecution in national security matters, to Lead Plaintiff. Lead Plaintiff through purposeful isolation as part of this conspiracy and through the abuse of Lead Plaintiff's oxytocin

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hormones using BRMT, went on to marry and remain in this very troubled fifteen year relationship with Jeanette through at least four long duration separations, including two episodes of ejection and two move-outs by Jeanette from their shared personal residence by Jeanette, each for four to six month periods of informal separation, during his marriage to his second wife Jeanette. During this period Lead Plaintiff, Jeanette, and Bryce, her minor child, lived directly across the street from the ostensible BURNS residence while BURNS allegedly lived there and practiced medicine two miles south near Evergreen Hospital. The BURNS residence was later occupied by others ostensibly related through blood to BURNS or through employment as embedded undercover agents of UNITED STATES, most likely USMS or FBI, while Lead Plaintiff was being abused, together with Jeanette and her son Bryce, a minor child, by BRMT throughout the entirety of that 15 year familial relationship. Defendant, in his personal capacity as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and acted severally to harm Lead Plaintiff and most probably other unidentified plaintiffs.

217. Robert HIBBS identified here in his personal capacity, practiced as an attorney at Keller Rohrback, Seattle, Washington and was either an illegally embedded employee of defendant UNITED STATES or a compromised informant used by UNITED STATES to manipulate and perpetuate its involuntary servitude of Lead Plaintiff. While at the law firm, HIBBS orchestrated but did not perform legal work related to various business transactions and litigation undertaken by Lead Plaintiff and entities he managed and/or controlled. While in this role, HIBBS participated directly in a series of complex illegal FBI business wrecking and financial entrapment scheme directed against the Lead Plaintiff, including (a) the acquisition of Steve's Maintenance, renamed Alliance after that acquisition, (b) a legal compromise of a theft of funds by the former "owners" likely actually undercover agents of, or informants compromised by defendant UNITED STATES through IRS or FBI, and (c) theft of compensation litigation against LazerSoft. These conspiracies were intended, among other things, (i) to avoid exposing the illegal use of Steve's Maintenance (renamed Alliance after purchase by Lead Plaintiff and FBI cutout ??) in an FBI investigation of the asbestos abatement industry in the region, (ii) to perpetuate FBI's secret co-ownership of Alliance, (iii) to deprive Alliance of vital SBA bid and performance guaranty bonds essential for public works projects, the primary source of business which deprivation was made by an FBI agent posing as an SBA employee, and (iv) to provide for Alliance's subsequent financial wrecking to support further BRMT development using illegal human experiments, personal financial bankruptcy related to personal factoring loan guarantees, and psychological stress on Lead Plaintiff, his second wife Jeanette and stepson Bryce, who lived together across the street from BURNS, (v) to cover two compensation thefts from Lead Plaintiff (by Steve's Maintenance and by LazerSoft, and (vi) to cover the theft of compensation during the sale of LazerSoft by Wembley plc to Network Imaging Corporation several years after Lead Plaintiff's departure after the LazerSoft optical data collection System 1500 failed to gain broad market acceptance as a surreptitious form of IT department access at major corporations to support illegal domestic and international spying operations of FBI and CIA. HIBBS knowingly perpetuated Lead Plaintiff's involuntary servitude by his actions. Defendant, in his personal capacity as a bad faith actor and under fraudulent concealment, acted well outside the scope of authority of legal counsel, and acted jointly with other defendants and acted severally to harm Lead Plaintiff and most probably other unidentified plaintiffs.

221. Vito PERILLO, a resident of Washington, identified here in his personal capacity, allegedly owned Pacific Pipeline, a book wholesaler with a national customer base of independent booksellers in the Pacific Northwest, several large national book retailers, and COSTCO, the warehouse club retailer.



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PERILLO was either an illegally embedded employee of defendant UNITED STATES or a compromised informant used by UNITED STATES to manipulate and perpetuate its involuntary servitude of Lead Plaintiff. PERILLO collaborated with ROSENBERG to orchestrate Board membership and employment and programmed termination of Lead Plaintiff once the residence across from former residence of BURNS was materially improved by Lead Plaintiff and his troubled marriage to second wife Jeanette was effectively ended. While in this role, PERILLO participated directly in a series of complex illegal FBI business wrecking and financial entrapment schemes directed against the Lead Plaintiff. PERILLO wrecked Pacific Pipeline by firing its biggest customer, Barnes and Noble, several months after stymying the attempted buyout of Pacific Pipeline by Lead Plaintiff. PERILLO knowingly perpetuated Lead Plaintiff's involuntary servitude by his actions. Defendant, in his personal capacity as a bad faith actor and under fraudulent concealment, acted well outside the scope of authority of legal counsel, and acted jointly with other defendants and acted severally to harm Lead Plaintiff and most probably other unidentified plaintiffs.

222. Darrell PRAY, a resident of Washington, identified here in his personal capacity, probably an FBI embed who collaborated with ROSENBERG in domestic spying operations at NutraSource as its CIO, the natural foods wholesaler established by WEISSMAN while illegally embedded as Puget Consumer Cooperative General Manager, and effectively controlled and managed by FBI through ROSENBERG as its CEO until it was sold to an Auburn, CA natural foods wholesaler. PRAY was an illegally embedded employee of defendant UNITED STATES, likely USMS, who conspired with others to manipulate and perpetuate its involuntary servitude of Lead Plaintiff. PRAY collaborated with ROSENBERG at NutraSource while Lead Plaintiff was on that Board and later served as a consultant to NutraSource. PRAY later joined Pacific Pipeline, still later CNA Industrial Engineering, and still later formed Allegent LLC dba Performa with Lead Plaintiff, which was then wrecked by FBI acts undertaken by KURGAN (FBI using check fraud), and by TECHNOLOGY SALES LEADS (FBI using wire frauds and interference with interstate commerce by using commercial businesses headquarters facilities, manufacturing plants, and distribution facilities to conduct a fraudulent sales leads starve-out campaign). PRAY knowingly perpetuated Lead Plaintiff's involuntary servitude by his actions. 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, and acted jointly with other defendants and acted severally to harm Lead Plaintiff and most probably other unidentified plaintiffs.

223. Michael KURGAN, then a resident of California, identified here in his personal capacity, probably an FBI agent, joined with PRAY and others while PRAY was at CNA Industrial Engineering to perform a distribution automation project for CUC, a commercial client of CNA, which was being led by Lead Plaintiff, and at Allegent, LLC to orchestrate bad check fraud during the wrecking of Allegent LLC by PRAY, KURGAN, FBI and co-conspirators. 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, and acted jointly with other defendants and acted severally to harm Lead Plaintiff and most probably other unidentified plaintiffs.

224. Larry COOK, a resident of Washington, identified here in his personal capacity, probably USMS, allegedly owned and did manage and control CNA Industrial Engineering and CNA Architecture, later Collins Woerman. Lead Plaintiff was employed from 1996 to 2002 at CNA Industrial Engineering on a variety of projects and succeeded Charles Hadjinian, a then former CIA connection from Nicaragua while under dictator Samozza, as its Managing Director. Cook acting through his control of CNA, also conspired

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with another embedded engineering firm in a complex FBI entrapment attempt involving inadequate CNA project financing and an engineering project scheduled for the US NAVY's NAVFAC Command at Puget Sound Naval Shipyard. Cook acting through CNA also conspired to engage in compensation theft against Lead Plaintiff, a repeated practice of FBI and USMS at various cover companies where Lead Plaintiff was human trafficked. These repeated thefts by COOK, FBI, USMS and others have required repeated legal expenditures by Lead Plaintiff, and by entities he owned or managed, for legal services and in compromise of amounts legally due to Lead Plaintiff which thereby compromised and even bankrupted Lead Plaintiff, an element of forced labor (18 USC § ??), part of their pattern of unindicted criminal acts of conspiracy in perpetuate illegal involuntary servitude and forced labor imposed on Lead Plaintiff by their knowing and willful actions and conspiracies. Defendant, in his personal capacity as a bad faith actor and under fraudulent concealment, acted well outside the scope of authority of an USMS or other federal agent, and acted jointly with other defendants and acted severally to harm Lead Plaintiff and most probably other unidentified plaintiffs.

226. Most probably a current or former FBI or USMS official, Mr. Marc CHALOM, identified here in his personal capacity, a resident of NJ, acted individually and in conspiracy with other individual and interstate Defendants, known and unknown, in the theft of services, property, equipment, financial, and other assets of Lead Plaintiff at an apartment building he ostensibly owns at 282 Palisade Avenue, Cliffside Park, NJ, likely owned secretly by USMS, and used wire and email fraud and interstate travel in the furtherance of the pattern of human trafficking, forced labor, theft, and other myriad frauds in interstate commerce. Defendant is identified here in his personal capacity. While employed by the UNITED STATES, engaged in bad faith acts, Defendant harmed Lead Plaintiff through his participation in Defendant UNITED STATES' BRMT and racketeering program. Defendant engaged with Lead Plaintiff in his role as the fake landlord in a federal "safe" house residence used to control Lead Plaintiff, as part of Defendant UNITED STATES BRMT and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by his actions. 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.

227. Most probably a current or former FBI or USMS official, Mr. Conrad ROSS, identified here in his personal capacity, a resident of NJ and NC, acted individually and in conspiracy with others, including with ROSENBERG (FBI), 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, and used wire and email fraud and interstate travel in the furtherance of their pattern of human trafficking, forced labor, and these other myriad frauds in interstate commerce. Defendant is identified here in his personal capacity. While employed by the United States, engaged in bad faith acts, Defendant harmed Lead Plaintiff through his participation in Defendant UNITED STATES' BRMT and racketeering program. Defendant engaged with Lead Plaintiff in his role as an employer at ESTABLISH, Fort Lee, NJ, as part of Defendant UNITED STATES BRMT and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by his actions. 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.

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228. Jonathan CROSS identified here in his personal capacity, most probably an FBI agent, acted individually and in conspiracy with others, in fraudulently misrepresenting himself and others as performing investment banking services at various BLACKPOOL and SHEFFORD defendant entities for Lead Plaintiff and related business entities, and used wire and email fraud in the furtherance of these frauds and dishonest services in interstate commerce. While employed by the UNITED STATES, engaged in bad faith acts, CROSS harmed Lead Plaintiff through his participation in Defendant UNITED STATES' BRMT and racketeering program. CROSS knowingly perpetuated Lead Plaintiff's involuntary servitude by his actions. Defendant, in his personal capacity as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and acted severally to harm Lead Plaintiff and most probably other unidentified plaintiffs.

229. Most probably a current or former FBI official, while in his role as Mr. Andrew "Andy" ALTAHAWI, a resident of NJ and/or FL, identified here in his personal capacity, acted individually and in conspiracy with others, in fraudulently misrepresenting himself and others as performing investment banking services for Lead Plaintiff and related business entities, and used wire and email fraud in the furtherance of these frauds and dishonest services in interstate commerce. While employed by the United States, engaged in bad faith acts, ALTAHAWI harmed Lead Plaintiff through his participation in Defendant UNITED STATES' BRMT and racketeering program. ALTAHAWI knowingly perpetuated Lead Plaintiff's involuntary servitude by his actions. 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.

232. Michael CASTRO identified here in his personal capacity, an FBI agent, acted individually and in conspiracy with others in fraudulently misrepresenting himself and others as performing services as the Vice President for commercial organic produce production operations of Winnett Perico, a startup entity owned and controlled by Lead Plaintiff, and partially funded by FBI agency funds invested through PREFERRED TRUST and SASHA'S FARM FRESH, an entity controlled by DEAN T. SMITH (FBI). CASTRO used false personation, wire and email frauds and other misrepresentations and frauds, and provided dishonest services in interstate commerce, all in the furtherance of this perpetuated conspiracy against the Lead Plaintiff. While employed by the UNITED STATES, engaged in bad faith acts, Defendant harmed Lead Plaintiff through his participation in defendant UNITED STATES' BRMT and racketeering program. 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.

233. PAUL SMITH identified here in his personal capacity, acted individually and in conspiracy with others in fraudulently misrepresenting himself and others as performing services as the Vice President and CFO of Winnett Perico, a startup entity owned and controlled by Lead Plaintiff, and partially funded by FBI agency funds invested through PREFERRED TRUST and SASHA'S FARM FRESH, an entity controlled by DEAN T. SMITH (FBI). PAUL SMITH used false personation, wire and email frauds and other misrepresentations and frauds, and provided dishonest services in interstate commerce, all in the furtherance of this perpetuated conspiracy against the Lead Plaintiff. While employed by the UNITED STATES, engaged in bad faith acts, Defendant harmed Lead Plaintiff through his participation in defendant UNITED STATES' BRMT and racketeering program. Defendant, in his personal capacity as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and acted severally to harm Lead Plaintiff and most probably other unidentified plaintiffs.

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234. Most probably a current or former FBI official, Andrew CARDONE identified here in his personal capacity, acted individually and in conspiracy with others in fraudulently misrepresenting himself and others as performing banking services for Lead Plaintiff and related business entities and used wire and email fraud in the furtherance of these frauds and dishonest services in interstate commerce. While employed by the UNITED STATES, engaged in bad faith acts, Defendant harmed Lead Plaintiff through his participation in Defendant UNITED STATES' BRMT and racketeering program. Defendant engaged with Lead Plaintiff in his role as a conductor of natural foods symposiums at BA Bestwick Cardone Group, a subsidiary of Bank of America, as part of Defendant UNITED STATES BRMT and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by his actions, including through his introduction to CALLAHAN at DOMINICK & DICKERMAN. 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.

235. Most probably a current or former FBI or USMS official, Mr. Michael CALLAHAN identified here in his personal capacity, (also possibly formerly known as Bob ROSS at WSU Perham; Dennis Zook at Amfac Distribution; Pacific Pipeline CEO Dennis last name not recollected; Zetec CEO; Jay CARTER at Liberty West; and Steve MCDONALD at ESTABLISH), likely a resident of NJ employed at times in the State of New York, acted individually and in conspiracy with others in fraudulently misrepresenting himself and others as performing investment banking services for Lead Plaintiff and related business entities, and used wire and email fraud in the furtherance of these frauds and dishonest services in interstate commerce. While employed by the UNITED STATES, engaged in bad faith acts, Defendant harmed Lead Plaintiff through his participation in Defendant United States' BRMT and racketeering program. Defendant engaged with Lead Plaintiff in his role as an investment banker at DOMINICK & DICKERMAN as part of defendant UNITED STATES BRMT and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's human trafficking and involuntary servitude by his actions. 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.

236. Most probably a current or former CIA official, most recently known as Mr. Mark GROSS, identified here in his personal capacity, while employed by the UNITED STATES and in his possible previous roles as (i) Michael Cunha, AFROTC cadet and WSU Resident Assistant Perham Hall in 1974-1975); (ii) Unknown Name as likely NAVY NAVFAC PSNS facilities tour leader in 2002 (paragraph ??); David KELLER at Liberty West in Maricopa County, AZ in approximately 2014-2015); and (iii) Mark GROSS at DOMINICK & DICKERMAN, then at Westmark Capital, from approximately 2017 to 2021, a resident of NJ or NY employed at times in the State of New York, acted individually and in conspiracy with others in fraudulently misrepresenting himself and others as performing investment banking services for Lead Plaintiff and related business entities, and used wire and email fraud in the furtherance of these frauds and dishonest services in interstate commerce. While employed by the United States, engaged in bad faith acts, Defendant harmed Lead Plaintiff through his participation in Defendant UNITED STATES' BRMT and racketeering program. Defendant knowingly perpetuated Lead Plaintiff's human trafficking and involuntary servitude by his actions. 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.

237. Most probably a current or former FBI official, Ron MCCORMICK identified here in his personal capacity, acted individually and in conspiracy with others in fraudulently misrepresenting himself and

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others while posing as a Senior Director at WALMART headquarters in Bentonville, AR as an interested corporate customer for Lead Plaintiff's Winnett Perico, and its related organic produce business entities, and used wire and email fraud in the furtherance of these frauds and dishonest services in interstate commerce. While employed by the UNITED STATES, engaged in bad faith acts, Defendant harmed Lead Plaintiff through his participation in Defendant UNITED STATES' BRMT and racketeering program. Defendant engaged with Lead Plaintiff in his role as a Senior Director reporting to senior management in the perishable products sourcing operations at WALMART as part of Defendant UNITED STATES BRMT and racketeering conspiracy. Defendant knowingly perpetuated Lead Plaintiff's involuntary servitude by his actions. 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.

238. Susan WALKER identified here in her personal capacity, an FBI agent, acted individually and in conspiracy with others in fraudulently misrepresenting herself as performing services as President of VENDORCO, which had close commercial ties to COSTCO which would benefit Winnett Cattle Company, an organic beef startup entity owned and controlled by Lead Plaintiff, and partially funded by FBI agency funds invested through PREFERRED TRUST and SASHA'S FARM FRESH, an entity controlled by DEAN T. SMITH (FBI). WALKER used false personation, wire and email frauds and other misrepresentations and frauds, and provided dishonest services in interstate commerce, all in the furtherance of this perpetuated conspiracy against the Lead Plaintiff by negotiating a contract with Winnett Cattle Company and arranging a meeting with Bob HUSKEY while he misrepresented himself as the Vice President in charge of beef procurement for COSTCO in an otherwise vacant COSTCO headquarters facility at its campus in Issaquah, Washington and in email and telephone communications. While employed by the UNITED STATES, WALKER engaged in bad faith acts, Defendant harmed Lead Plaintiff through her participation in defendant UNITED STATES' BRMT and racketeering program. Defendant, in her personal capacity as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and acted severally to harm Lead Plaintiff and most probably other unidentified plaintiffs.

239. Bob HUSKEY identified here in his personal capacity, an FBI agent, acted individually and in conspiracy with others in fraudulently misrepresenting himself as performing services as the Vice President of COSTCO which would benefit Winnett Cattle Company, an organic beef startup entity owned and controlled by Lead Plaintiff, and partially funded by FBI agency funds invested through PREFERRED TRUST and SASHA'S FARM FRESH, an entity controlled by DEAN T. SMITH (FBI). HUSKEY used false personation, wire and email frauds and other misrepresentations and frauds, and provided dishonest services in interstate commerce, all in the furtherance of this perpetuated conspiracy against the Lead Plaintiff by fraudulently engaging in a meeting in an otherwise vacant COSTCO headquarters facility at its campus in Issaquah, Washington, orchestrated by WALKER and then a months-long negotiation of a potential contract with Winnett Cattle Company which ended in failure as is typical of such FBI interferences with interstate commerce. While employed by the UNITED STATES, HUSKEY engaged in bad faith acts, Defendant harmed Lead Plaintiff through his participation in defendant UNITED STATES' BRMT and racketeering program. Defendant, in his personal capacity as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and acted severally to harm Lead Plaintiff and most probably other unidentified plaintiffs.

240. Brad KUMIN a resident of Texas identified here in his personal capacity, an FBI agent, acted individually and in conspiracy with others in fraudulently misrepresenting himself as performing services



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as the Vice President and Chief Revenue Officer of Winnett Cattle Company, an organic beef startup entity owned and controlled by Lead Plaintiff, and partially funded by FBI agency funds invested through PREFERRED TRUST and SASHA'S FARM FRESH, an entity controlled by DEAN T. SMITH (FBI). KUMIN used false personation, wire and email frauds and other misrepresentations and frauds, and provided dishonest services in interstate commerce, all in the furtherance of this perpetuated conspiracy against the Lead Plaintiff by fraudulently engaging in fraudulent potential sales domestic and international opportunities, quotations, and contracts for Winnett Cattle Company. While employed by the UNITED STATES, KUMIN engaged in bad faith acts, Defendant harmed Lead Plaintiff through his participation in defendant UNITED STATES' BRMT and racketeering program. Defendant, in his personal capacity as a bad faith actor and under fraudulent concealment, acted jointly with other defendants and acted severally to harm Lead Plaintiff and most probably other unidentified plaintiffs.

241. Most probably a current or former FBI official in New York, while known as Bradford ROSSI, posing as an employee and key principal of SOLE SOURCE Capital, is identified here in his personal capacity. While employed by the United States, engaged in bad faith acts, Mr. ROSSI harmed Lead Plaintiff through his participation in Defendant UNITED STATES' BRMT and racketeering program. Defendant engaged with Lead Plaintiff in his role as a principal in a private equity fund and financier to verbally promise and never deliver financing for a project in interstate commerce, later reneged in an email by another FBI agent TURNER (below) as part of defendant UNITED STATES BRMT and racketeering conspiracy. ROSSI knowingly perpetuated Lead Plaintiff's involuntary servitude by his actions. 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.

242. Most probably a current or former FBI official in New York, while known as Dewey TURNER, posing as an employee of SOLE SOURCE Capital, is identified here in his personal capacity. While employed by the United States, engaged in bad faith acts, Mr. TURNER harmed Lead Plaintiff through his participation in Defendant United States' BRMT and racketeering program. Defendant engaged with Lead Plaintiff in his role as a principal in a private equity fund and financier to promise with ROSSI, then renege on that verbal promise by ROSSI and never deliver financing for a project in interstate commerce as part of defendant UNITED STATES BRMT and racketeering conspiracy. TURNER knowingly perpetuated Lead Plaintiff's involuntary servitude by his actions. 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.

243. Most probably a current or former FBI official in Amarillo, Texas, while known as Michael MAGGARD, is identified here in his personal capacity. While employed by the UNITED STATES, engaged in bad faith acts, Mr. MAGGARD, posing as an officer of CFO SEARCH harmed Lead Plaintiff through his participation in Defendant United States' BRMT and racketeering program. Defendant engaged with Lead Plaintiff in his role as a recruiter to recruit a CFO for interstate commerce in a fraudulent scheme and to lend funds in interstate commerce as part of an entrapment attempt by FBI as part of defendant UNITED STATES BRMT and racketeering conspiracy. MAGGARD knowingly perpetuated Lead Plaintiff's involuntary servitude by his actions. 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.