

1 drug companies to corruptly influence the outcome of the votes to pass SB277. All
2 one has to do is follow the money trail.

3
4 **109.** All of the corruption of the Defendant legislators in passing SB277 is
5 underscored by the criminal fraud and corruption being perpetrated by the Center
6 for Disease Control (CDC) with respect to the efficacy of the MMR and other
7 vaccines. Despite this fact the CDC has and is still standing on their claims that all
8 vaccines are safe, effective and needed by our society. This is yet another bright
9 and shining lie motivated around politicians and the drug cartels' financial
10 incentives to keep getting richer at the expense of the health and well-being of
11 Plaintiffs' offspring. Meanwhile the Vaccine Court in New York has paid out 3.2
12 billion dollars in settlements for vaccine injured plaintiffs. Just taking into account
13 the amount of pay-outs given to citizens who've been injured from vaccinations is
14 enough proof that vaccines are not safe and not effective.

15 **The CDC And Merck Has Come Under Fire Due To Corruption and Fraud**

16
17 **110.** In a recent article written by the Huffington Post on 9/25/2014:

18
19 “Merck, the pharmaceutical giant, is facing a slew of controversies over its
20 Measles-Mumps-Rubella (MMR) vaccine following numerous allegations of
21 wrongdoing from different parties in the medical field, including two former
22 Merck scientists-turned-whistleblowers. A third whistleblower, this one a scientist
23 at the Centers for Disease Control, also promises to bring Merck grief following
24 his confession of misconduct involving the same MMR vaccine.

25
26 The controversies will find Merck defending itself and its vaccine in at least two
27 federal court cases after a U.S. District judge earlier this month [threw out Merck's](#)
28 [attempts](#) at dismissal. Merck now faces federal charges of fraud from the

1 whistleblowers, a vaccine competitor and doctors in New Jersey and New York.
2 Merck could also need to defend itself in Congress: The staff of representative Bill
3 Posey (R-Fla) -- a longstanding [critic of the CDC](#) interested in an alleged link
4 between vaccines and autism -- is now reviewing some [1,000 documents that the](#)
5 [CDC whistleblower turned over](#) to them.

6
7 The first court case, [United States v. Merck & Co.](#), stems from claims by two
8 former Merck scientists that Merck "fraudulently misled the government and
9 omitted, concealed, and adulterated material information regarding the efficacy of
10 its mumps vaccine in violation of the FCA [False Claims Act]."

11
12 According to the whistleblowers' court documents, Merck's misconduct was far-
13 ranging: It "failed to disclose that its mumps vaccine was not as effective as Merck
14 represented, (ii) used improper testing techniques, (iii) manipulated testing
15 methodology, (iv) abandoned undesirable test results, (v) falsified test data, (vi)
16 failed to adequately investigate and report the diminished efficacy of its mumps
17 vaccine, (vii) falsely verified that each manufacturing lot of mumps vaccine would
18 be as effective as identified in the labeling, (viii) falsely certified the accuracy of
19 applications filed with the FDA, (ix) falsely certified compliance with the terms of
20 the CDC purchase contract, (x) engaged in the fraud and concealment describe
21 herein for the purpose of illegally monopolizing the U.S. market for mumps
22 vaccine, (xi) mislabeled, misbranded, and falsely certified its mumps vaccine, and
23 (xii) engaged in the other acts described herein to conceal the diminished efficacy
24 of the vaccine the government was purchasing."

25
26 These fraudulent activities, say the whistleblowers, were designed to produce test
27 results that would meet the FDA's requirement that the mumps vaccine was 95 per
28 cent effective. To the whistleblowers' delight, the judge dismissed Merck's

1 objections to the case proceeding, finding the whistleblowers had plausible
2 grounds on all of the claims lodged against Merck.

3
4 If the whistleblowers win, it would represent more than a moral victory (they
5 repeatedly tried to stop Merck while still in its employ). Under the False Claims
6 Act, the whistleblowers would receive a share -- likely 25 per cent to 30 per cent --
7 of the amount the government recovers. Previous settlements involving extensive
8 fraud by pharmaceutical companies under the False Claims Act have run into the
9 hundreds of millions of dollars, and in some cases such as against
10 GlaxoSmithKline and Pfizer, into the billions.

11
12 The second court case, Chatom Primary Care v. Merck & Co. relies on the same
13 whistleblower evidence. This class action suit claims damages because Merck had
14 fraudulently monopolized the mumps market. Doctors and medical practices in the
15 suit would be able to obtain compensation for having been sold an overpriced
16 monopolized product, and a defective one to boot, in that the mumps vaccine
17 wasn't effective (indeed, the suit alleged that Merck expected outbreaks to
18 occur and, as predicted, they did -- mumps epidemics occurred in 2006 in a highly
19 vaccinated population and again in 2009-2010).

20
21 "Plaintiffs have argued sufficient facts to sustain a claim for proximate causation,
22 detailing the significant barriers that other companies would face to enter the
23 mumps vaccine market," the court ruled.

24
25 "The third whistleblower -- a senior CDC scientist named William Thompson --
26 only indirectly blew the whistle on Merck. He more blew it on himself and
27 colleagues at the CDC who participated in a 2004 study involving the MMR
28 vaccine. Here, the allegations involve a cover-up of data pointing to high rates of

1 autism in African-American boys after they were vaccinated with MMR. In what
2 could be high-profile House hearings before Congressman Posey's Science
3 Committee -- hearings made all the more explosive given the introduction of race
4 into the mix -- Merck could find itself under unprecedented scrutiny. The CDC still
5 stands by its study although Frank DeStefano, the CDC's Director of Immunization
6 Safety and a co-author in the CDC study, also stated that he plans to review his
7 notes with an eye to reanalyzing the data. Some say all publicity is good. In
8 Merck's case, regardless of the ultimate merits, the publicity will be all bad.”
9

10 *-Huffington Post.*
11

12 **111.** The Defendants Pan, Allen, Gonzalez and the other Defendant legislators
13 knew before hand of these lawsuits and were aware of the harmful heavy metals
14 inside these vaccines long before the house and senate hearings on SB277. The
15 Defendant legislators were at this point already paid off by the lobbyist from the
16 pharmaceutical cartels and did not care about their lawful duty to do the right thing
17 under the law as required by their oaths.
18

19 **Defendants' Ongoing, Open-Ended Pattern of Racketeering Activity**
20

21 **112.** On information and belief, in furtherance of their racketeering scheme the
22 Defendant legislators routinely engaged in unlawful service and duties to their
23 offices and to the citizens they purport to represent by accepting bribes in the form
24 of money and other considerations from drug company lobbyists to pass legislation
25 that extorts the rights of the citizens of California for the Defendants' own
26 financial gain and profit. For purposes of this section, generic description of
27 "bribery" is conduct which is intended, at least by the alleged briber, as an assault
28

1 on the integrity of a public office or an official action. U.S. v. Forsythe, C.A.3 (Pa.)
2 1977, 560 F.2d 1127.

3
4 **113.** On information and belief, in furtherance of their racketeering scheme
5 Defendant legislators routinely violate their Oaths of office which mandates that
6 they support and defend the California and United States constitutions, including
7 the Bill of Rights, from all enemies foreign and domestic, especially with respect
8 to any law making activities affecting the liberties of the citizens of the state of
9 California whom they purport to represent. The Defendant legislators willfully,
10 wantonly and recklessly violated their oaths to the California and U.S.
11 constitutions by passing SB277.

12
13 **114.** Further, on information and belief, in furtherance of their racketeering
14 scheme Defendant legislators routinely have meetings on the house floor and
15 senate to give the public the illusion that legitimate democratic processes are at
16 work within the procedures and hearings of the state capitol building, when in fact
17 Defendants collude and conspire with one another in conducting secret meetings
18 behind closed doors before and afterwards to corruptly influence the outcome of
19 the passage of certain bills for their own financial gain and profit, all while
20 extorting the liberty and freedoms of Plaintiffs and other California residents.

21
22 **115.** On information and belief, in furtherance of their racketeering scheme
23 Defendant legislators routinely collude and conspire with one another to use the
24 house and senate hearings at the state capital as their conduit and venue to extort
25 the liberty and certain rights of Plaintiffs and other California citizens of their
26 property, money and liberty by sham, oppressive legislation like SB277 and other
27 similar bills.

1 **116.** On information and belief, in furtherance of their racketeering scheme
2 Defendant legislators' receive the financial benefit of their corrupt activities
3 through their salaries and pensions which are all directly or indirectly derived from
4 the activities of their standard pay which is over \$97,000 per annum plus the illegal
5 contributions and bribes from the drug companies and their lobbyist while in
6 office.

7
8 **117.** On information and belief, in furtherance of their racketeering scheme, Co-
9 conspirators Defendant legislators' spouses have conspired to aid, abet, encourage
10 and supported the Defendant legislators in their corrupt and criminal enterprises
11 while receiving the financial benefit of their public officials' corrupt activities.
12 These Defendant spouses and Co-conspirators are, Win-Li Wang, Cindy Block,
13 Sky Hill, Dan Baker, Diana Nazarian, Jane Wood, George Eskin, Robbie Black,
14 Laurel Quirk, Douglas Jackson, Sue Lemke, Candace Chen, Annie Lam, Pat
15 Lafkas, Erika McGuire, Bruce Wolk, Kristen Cooper, Judy McCarthy, Kathy Stone
16 and Anne Gust.

17
18 **Defendants' Predicate Acts of Obstruction of Justice & Conspiracy to**
19 **Obstruct Justice**

20
21 **118.** Defendant legislators, including Defendant Edmund Brown on behalf of the
22 Defendant State of California, have conspired with, aided, abetted, colluded and
23 agreed with one another to engage in a continuous pattern of racketeering activity
24 as defined in 18 U.S.C. § 1961 Subsection 1503, in that they have engaged in two
25 or more predicate acts of Obstruction of Justice within the preceding two years
26 using the California Legislature as a conduit as described herein.

1 **119.** Defendant legislators conspired and colluded with one another and agreed to
2 join the conspiracy, agreed to commit predicate acts (breach or perjury of their
3 oaths), and knew that those acts were part of a pattern of racketeering activity.
4 Each and every Defendant legislator agreed to participate in the conduct of the
5 affairs of the criminal enterprise through a pattern of racketeering activity, and
6 further engaged in a conspiracy to pervert or obstruct justice with the intent to
7 corruptly influence the outcome of the state legislative law making process on the
8 floor of the house and senate hearings in violation of 18 U.S.C. § 1962(d)). All of
9 the above mentioned predicate acts committed by the Defendant legislators were
10 condoned and sanctioned by the Defendant State of California.

11 **120.** The predicate act of Obstruction of Justice, 18 U.S.C. §1503 provides:

12 -Whoever corruptly, or by threats or force, or by any threatening letter or
13 communication influences, obstructs, or impedes or endeavors to influence,
14 obstruct, or impede the due and proper administration of the law under which any
15 pending proceeding is being had before any department or agency of the United
16 States (the State of California is enjoined and incorporated into the United States as
17 an agency and or subsidiary by and through the 14th Amendment) , or the due and
18 proper exercise of the power of inquiry under which any inquiry or investigation is
19 being had by either House, or any committee of either House or any joint
20 committee of the Congress.

21 - Whoever corruptly, or by threats or force, or by any threatening letter or
22 communication, endeavors to influence, intimidate, or impede..... or by any
23 threatening letter or communication, influences, obstructs, or impedes, or
24 endeavors to influence, obstruct, or impede, the due administration of justice, shall
25 be punished as provided in subsection (b).

26 (b) The punishment for an offense under this section is—

27 (1) In the case of a killing, the punishment provided in sections 1111 and 1112;
28

1 (2) In the case of an attempted killing, or a case in which the offense was
2 committed against a petit juror and in which a class A or B felony was charged,
3 imprisonment for not more than 20 years, a fine under this title, or both; and

4 **(3) In any other case, imprisonment for not more than 10 years, a fine under**
5 **this title, or both.**

6
7
8 **FIRST CLAIM FOR RELIEF FOR VIOLATION OF**
9 **THE RACKETEERING INFLUENCED AND CORRUPT**
10 **ORGANIZATIONS ACT ("RICO") 18 U.S.C. § 1961**
11 **(By Plaintiffs Against All Defendants)**

12 **121.** Plaintiffs reallege and incorporate in this First Claim for Relief each and
13 every allegation set forth above as though fully set forth herein.

14 **122.** A "R.I.C.O." enterprise may include courts. *United States v. Angelilli*, 660
15 F.2d 23 (2nd Cir. 1981). (See *United States v. Thompson*, 685 F.2d 993
16 (6th Cir. 1982), alleging that governor's office in Tennessee was a criminal
17 enterprise.) See also *United States v. Stratton*, 649 F.2d 1066 (1981) alleging
18 that Florida's Third Judicial Circuit met the requisite of a "RICO" enterprise;
19 *United States v. Clark*, 646 F.2d 1259 (8th Cir. 1981), holding that a
20 governmental agency can be a RICO enterprise, and listed several, including
21 examples: the office of county judge to be an enterprise under the "RICO"
22 Act and any other government agencies or offices; *United States v. Altomare*,
23 625 F.2d 5, 7, n.7 (4th Cir. 1980), the office of county prosecutor; *United*
24 *States v. Grzywacz*, 603 F.2d 682, 686 (7th Cir. 1979), the city police
25 department. Among the government units that have been held to be "
26 enterprises" are offices of **governors** and **state legislators**, courts and court
27 clerks' offices. See e.g., *United States v. Stratton*, 649 F.2d 1066, 1072-75 (5th
28 Cir. 1981);

1 **123.** The “R.I.C.O.” enterprise described herein consists of all the named
2 Defendants: Richard Pan, Win-Li Wang, Martin Jeffrey “Marty” Block, Cindy
3 Block, Gerald A. “Jerry” Hill, Sky Hill, Holly Mitchell, Catharine Baker, Dan
4 Baker, Christina Garcia, Adrin Nazarian, Diana Nazarian, Jim Wood, Jane
5 Wood, Ben Allen, Kevin de Leon, Hannah-Beth Jackson, George Eskin, Jeff
6 Stone, Richard Bloom, Robbie Black, Bill Quirk, Laurel Quirk, Lorena Gonzalez,
7 Reginald Jones-Sawyer, Isadore Hall, Mark Leno, Douglas Jackson, Bob
8 Wieckowski, Sue Lemke, David Chiu, Candace Chen, Evan Low, Anthony
9 Rendon, Annie Lam, Jim Beall, Robert Hertzberg, Mike McGuire, Erika
10 McGuire, Lois Wolk, Bruce Wolk, Jim Cooper, Kristen Cooper, Kevin
11 McCarthy, Judy McCarthy, Mark Stone, Kathy Stone, Edmund G. Brown Jr.,
12 Anne Gust and The State of California.

13
14 **124.** At all relevant times herein, all Defendants and the Co-conspirators were
15 “persons” within the meaning of RICO, 18 U.S.C. §§ 1961(3) and 1964(4).
16

17 **125.** At all relevant times herein, Defendants and Co-conspirators formed an
18 association-in-fact for the specific purpose of extorting the constitutional rights of
19 Plaintiffs, their school-age offspring and those similarly situated as such rights
20 are guaranteed and secured by the First Amendment (right of deeply held
21 spiritual beliefs in rejecting having certain animal and or human tissues or
22 poisonous chemicals forced into their offspring’s bodies; the rights of parents to
23 choose a particular medical procedure with respect to their offspring whether
24 born or unborn; the right to informed consent over a medical procedure regarding
25 their offspring); and, by the Fourth Amendment (the right of privacy and to be let
26 alone by government, or anyone or any agency acting on government’s behalf);
27 and, by the Fifth Amendment (the right not to be assaulted, maimed or killed with
28 a needle filled with poisonous substances without due process of law, or the right

1 not to lose their life, health, well-being or liberty without due process of law);
2 and, by the Ninth Amendment (the fundamental and common law right of life,
3 liberty, and right to protect the life, health, well-being and liberty of their
4 offspring); and, by the Fourteenth Amendment (the right of due process of law
5 before any rights may be taken away, and the equal protection of ALL laws state
6 and federal including but not limited to the right to opt out of any tyrannical
7 governmental medical experiment or treatment.
8

9 **126.** This association-in-fact was an “enterprise” within the meaning of RICO,
10 18 U.S.C. § 1961(4).
11

12 **127.** At all relevant times herein, this “law” making enterprise was engaged in,
13 and its activities affected interstate and foreign commerce, within the meaning of
14 RICO, 18 U.S.C. § 1961 (Sec. 1951).
15

16 **128.** At all relevant times herein, all Defendants and other Co-conspirators
17 associated with this enterprise conducted or participated directly or indirectly, in
18 the conduct of the enterprise’s affairs through a “pattern of racketeering activity”
19 within the meaning of 18 U.S.C. § 1961 (Sec. 1952), in violation of RICO, 18
20 U.S.C. § 1961 & 1962(C) and as alleged in paragraphs 98 through 134 above.
21

22 **129.** 18 U.S.C. § 1961 provides in pertinent parts:

23 (1). “racketeering activity” means (A) any act or threat involving murder,
24 kidnapping, gambling, arson, robbery, bribery, extortion, dealing in obscene
25 matter, or dealing in a controlled substance or listed chemical (as defined in
26 section 102 of the Controlled Substances Act), which is chargeable under State
27 law and punishable by imprisonment for more than one year; (B) any act which is
28 indictable under any of the following provisions of title 18, United States Code:

1 Section 201 (relating to bribery), section 1341 (relating to mail fraud), section
2 1343 (relating to wire fraud), section 1344 (relating to financial institution fraud),
3 section 1503 (relating to obstruction of justice), section 1512 (relating to
4 tampering with a witness, victim, or an informant), section 1513 (relating to
5 retaliating against a witness, victim, or an informant), section 1951 (relating to
6 interference with commerce, robbery, or extortion), section 1952 (relating to
7 racketeering), 1958 (relating to use of interstate commerce facilities in the
8 commission of murder-for-hire), sections 175–178 (relating to biological
9 weapons), sections 229–229F (relating to chemical weapons).

10
11 **130.** Specifically, at all relevant times herein, Defendant legislators and other
12 Co-conspirators engaged in “racketeering activity” within the meaning of 18
13 U.S.C. § 1961(1) by engaging in Obstruction of Justice in violation of 18 U.S.C.
14 § 1503 by corruptly influencing the outcome of the house and senate hearings to
15 pass bill SB277; and, Perjury of their Oaths to the California and U.S.
16 Constitutions resulting in treason and Seditious Conspiracy to overthrow the state
17 and federal Constitutions; and further engaged in a Conspiracy to Obstruct
18 Justice in violation of 18 U.S.C. § 1951 relating to interference with commerce,
19 robbery, or extortion; and, further engaged in a Conspiracy to Racketeer in
20 violation of section 1951 of section 1961 and 1962(d).

21
22 **131. Extortion of Plaintiffs’ Liberty-** A conviction for extortion within the
23 meaning of the Hobbs Act requires that the Defendants obtained “property” or
24 “liberty” from another, with his consent, induced by wrongful use of actual or
25 threatened force, or fear, or under color of official right. 18 U.S.C. § 1503.

26
27 **132.** In furtherance of their racketeering and extortion scheme, the Defendants
28 have used their offices, positions, influence, affiliates and sub agencies including

1 but not limited to the Superintendent of Schools, the County Health Departments,
2 local law enforcement, Child Protective Services and health care providers to
3 threaten, intimidate, coerce and or incarcerate Plaintiffs (the parents of
4 unvaccinated or partially vaccinated offspring) for bogus criminal charges
5 including, Parental Negligence, Child Endangerment, Truancy, etc. should they
6 fail to comply with Defendants' unconstitutional bill.

7
8 **133.** The acts set forth above constitute a violation of one or more of the
9 prohibited overt acts under 18 U.S.C. §1961 and 18 U.S.C. § 1962(c). All the
10 Defendants and the other Co-conspirators each committed and/or aided and
11 abetted the commission of two or more of these acts of racketeering activity.

12
13 **134.** The acts of racketeering activity referred to in the previous paragraphs
14 constituted a "pattern of racketeering activity" within the meaning of 18 U.S.C. §
15 1961(5). The acts alleged were related to each other by virtue of common
16 participates (all named Defendants), a common victim (Plaintiffs, Plaintiffs'
17 offspring and others similarly situated), a common method of commission
18 (closed door meetings and perjury of their oaths), and the common purpose and
19 common result of extorting the constitutional rights of Plaintiffs and others
20 similarly situated depriving said Plaintiffs or class of persons of equal protection
21 of the laws or equal privileges and immunities under the law. The Defendant
22 legislators and other Co-conspirators did commit the overt acts as alleged in this
23 complaint in furtherance of conspiracy to the injury of Plaintiffs' person or
24 property and deprived Plaintiffs of Plaintiffs' rights and or privileges as citizens
25 of the united States America.

1 **135.** The Obstruction of Justice and Extortion of Rights scheme being
2 committed by the Defendants have continued for over two years and threatens to
3 continue despite the institution of this Complaint.
4

5 **136.** As a result of Defendants and the other Co-conspirators' violations of 18
6 U.S.C. § 1961 & 1962(c), Plaintiffs have lost a substantial amount of their time,
7 money, labor and constitutional freedoms as a result of the racketeering activities
8 conducted in the fraudulent bill passing scheme and as part of the prohibited
9 activities herein alleged.
10

11 **137.** As a result of their racketeering enterprise, Defendants are liable to the
12 Plaintiffs for their losses in an amount to be determined at trial.
13

14 **138.** Pursuant to RICO, 18 U.S.C. § 1964(c), Plaintiffs are entitled to recover
15 threefold their damages plus costs from Defendants. The Defendants' acquisition,
16 control and interest in this RICO enterprise were the proximate cause of damages
17 and injury to Plaintiffs.
18

19 **SECOND CLAIM FOR RELIEF FOR VIOLATION OF**
20 **THE RACKETEERING INFLUENCED AND CORRUPT**
21 **ORGANIZATIONS ACT ("RICO") 18 U.S.C. § 1962(a)(d), CONSPIRACY**
22 **(By Plaintiffs Against All Defendants)**

23 **139.** Plaintiffs reallege and incorporate in this Second Claim for Relief each and
24 every allegation set forth above, as though fully set forth herein.
25

26 **140.** 18 U.S.C. § 1962(a) provides in relevant part: "It shall be unlawful for any
27 person who has received any income derived, directly or indirectly, from a pattern
28 of racketeering activity orto use or invest, directly or indirectly, any part

1 of such income, or the proceeds of such income, in the acquisition of any interest
2 in, or the establishment or operation of, any enterprise which is engaged in, or the
3 activities of which affect, interstate or foreign commerce."

4
5 **141.** 18 U.S.C. § 1962(d) provides in relevant part:

6 It shall be unlawful for any person to conspire to violate any of the provisions of
7 subsection (a), (b), or (c) of this section.
8

9 **142.** Through the acquisition of the income derived from its open-ended pattern
10 of racketeering activity, Defendants not only invest in an ever-expanding drug
11 companies which also funds Defendants' criminal enterprise with kickbacks in
12 the form of campaign contributions and other known and unknown perks.

13 Defendants also use the funds for government lobbying purposes to influence
14 local and state legislation which has a direct effect on both interstate and foreign
15 commerce in direct violation of 18 U.S.C. § 1962(a) and Section 1961.
16

17 **143.** At all relevant times herein, Defendants and the Conspirators were each a
18 "person" within the meaning of RICO, 18 U.S.C. §§ 1961(3) and 1962(d).
19

20 **144.** At all relevant times herein, Defendants and the Co-conspirators formed an
21 association-in-fact for the specific purpose of obstructing justice and extorting the
22 constitutional rights of Plaintiffs and others similarly situated. This association-in-
23 fact was an "enterprise" within the meaning of RICO, 18 U.S.C. § 1961(4).
24

25 **145.** At all times relevant herein, this enterprise was engaged in, and its activities
26 affected, interstate and foreign commerce, within the meaning of RICO, 18 U.S.C.
27 § 1962(c).
28

1 **146.** As set forth in Plaintiffs' First Claim For Relief, Defendants and each of the
2 Co-conspirators associated with this enterprise conducted or participated, directly
3 or indirectly, in the conduct of the enterprise's affairs through a "pattern of
4 racketeering activity" within the meaning of RICO, 18 U.S.C. § 1961(5), in
5 violation of RICO, 18 U.S.C. § 1962(c).

6
7 **147.** At all relevant times herein, Defendants and the other Co-conspirators each
8 were associated with the enterprise and agreed and conspired to violate 18 U.S.C. §
9 1962(c), that is, agreed to conduct and participate, directly or indirectly, in the
10 conduct of the affairs of the enterprise through a pattern of activity, in violation of
11 18 U.S.C. § 1962(d).

12
13 **148.** Defendants and other Co-conspirators committed and caused to be
14 committed a series of overt acts in furtherance of the conspiracy and to affect the
15 objects thereof, including but not limited to the acts set forth above. "A defendant
16 can be guilty of [violation of Section 1962(d) for] conspiring to violate a law
17 [Section 1962(c)], even if he is not among the class of persons who could commit
18 the crime directly." (emphasis added) abrogated on other grounds by *Salinas v.*
19 *United States*, 522 U.S. 52 (1997). A conspiracy may exist even if a conspirator
20 does not agree to commit or facilitate each and every part of the substantive
21 offense. See *United States v. Socony-Vacuum Oil Co.*, 310 U.S. 150, 253-254
22 (1940). The partners in the criminal plan must agree to pursue the same criminal
23 objective and may divide up the work, yet each is responsible for the acts of each
24 other. See *Pinkerton v. United States*, 328 U.S. 640, 646 (1946) ("And so long as
25 the partnership in crime continues, the partners act for each other in carrying it
26 forward"). If conspirators have a plan which calls for some conspirators to
27 perpetrate the crime and others to provide support, the supporters are as guilty as
28 the perpetrators. As Justice Holmes observed: "[P]lainly a person may conspire for

1 the commission of a crime by a third person.” United States v. Holte, 236 U.S. 140,
2 144 (1915).

3
4 **149.** As a result of Defendants and the other Co-conspirators’ violations of 18
5 U.S.C. § 1962(d), the Plaintiffs have lost hundreds of dollars in: petitioning the
6 Defendants to not violate their rights, travel to and from the state capitol in
7 Sacramento for the same purpose, which was to halt the criminal schemes
8 Defendants created, organized, promoted, enacted and continue to operate and run.

9
10 **150.** As a result of the Conspiracy, Defendants are liable to the Plaintiffs for their
11 losses in an amount to be determined at trial.

12
13 **151.** Pursuant to RICO, 18 U.S.C. § 1964(c), the Plaintiffs are entitled to recover
14 threefold their damages plus costs from Defendants.

15
16 **152.** Plaintiffs have been injured in their business and property in accordance
17 with U.S.C. § 1962(a)(c)(d) as a direct and proximate result of the racketeering
18 activities of Defendants, and each of them, in that the Defendants’ criminal
19 legislative acts were directed at Plaintiffs, Plaintiffs’ offspring, and others
20 similarly situated.

21
22 **153.** Defendants’ criminal enterprise have caused Plaintiffs to conduct legal
23 research and incur court filing fees in federal court, and have caused Plaintiffs
24 emotional distress, fear, anxiety and lack of sleep in having to defend themselves
25 from Defendants’ unlawful criminal activities.

26
27 **154.** The exact amount of Plaintiffs’ economic damages incurred as a direct and
28 proximate result of Defendants’ conduct is unknown at this time. Plaintiffs will

1 seek leave of Court to amend this Complaint to set forth the exact amount thereof
2 when the same is ascertained.

3
4 **155.** As a direct and proximate result of the acquisition, maintenance, interest,
5 control and income derived from the racketeering activities of the Defendants,
6 and each of them, as described herein, Plaintiffs have suffered injuries to
7 Plaintiffs' persons and property, and are entitled to recover treble damages for the
8 injuries they have sustained, according to proof, as well as costs of suit and
9 reasonable attorneys' fees, pursuant to 18 U.S.C. § 1964(c).

10
11 **156.** As a direct and proximate result of the racketeering activities of the
12 Defendants, and each of them, as described herein, Plaintiffs are entitled to an
13 Order, pursuant to 18 U.S.C. § 1964(a), enjoining and prohibiting the
14 Defendants, and each of them, from further engaging in the same conduct as the
15 enterprise has engaged in.

16
17 **THIRD CLAIM FOR RELIEF FOR VIOLATION OF 18 U.S.C. § 175,**
18 **CHAPTER 10- CONSPIRACY TO PROMOTE THE SALE AND USE OF**
19 **BIOLOGICAL WEAPONS ON CALIFORNIA CITIZENS**
20 **(By Plaintiffs Against All Defendant Legislators)**

21 **157.** Plaintiffs reallege and incorporate in this Third Claim for Relief each and
22 every allegation set forth above, as though fully set forth herein.

23
24 **158. Sec. 175 - Prohibitions with respect to biological weapons.**

25 (a) In General.—Whoever knowingly develops, produces, stockpiles, transfers,
26 acquires, retains, or possesses any biological agent, toxin, or delivery system for
27 use as a weapon, or knowingly assists a foreign state or any organization to do so,
28 or attempts, threatens, or conspires to do the same, shall be fined under this title or
imprisoned for life or any term of years, or both. There is extraterritorial Federal

1 jurisdiction over an offense under this section committed by or against a national
2 of the United States.

3 (b) Additional Offense.—Whoever knowingly possesses any biological agent,
4 toxin, or delivery system of a type or in a quantity that, under the circumstances, is
5 not reasonably justified by a prophylactic, protective, bona fide research, or other
6 peaceful purpose, shall be fined under this title, imprisoned not more than 10 years,
7 or both. In this subsection, the terms “biological agent” and “toxin” do not
8 encompass any biological agent or toxin that is in its naturally occurring
9 environment, if the biological agent or toxin has not been cultivated, collected, or
10 otherwise extracted from its natural source.

11 (c) Definition.—For purposes of this section, the term “for use as a weapon”
12 includes the development, production, transfer, acquisition, retention, or possession
13 of any biological agent, toxin, or delivery system for other than prophylactic,
14 protective, bona fide research, or other peaceful purposes.

15 **159.** The Defendants are well aware of the fact that all of the CDC scheduled
16 vaccines are riddled with heavy metals (aluminum, formaldehyde, mercury, human
17 DNA cells, etc.), neurotoxins and deadly Retroviruses according to Dr. Judy
18 Mikovits, an ex-government scientist, PhD in Bio Chemistry and Molecular
19 Biology. These chemical compounds administered as “vaccines” do not cure
20 diseases but causes diseases including Autism, Chronic Fatigue Syndrome, HIV,
21 Cancer and life threatening allergies.

22 https://www.youtube.com/watch?v=KUtIO_h1fRA

23 **160.** All the Defendant legislators have knowledge of these toxins and risks of
24 exposure to the Plaintiffs and Plaintiffs’ offspring. The vaccine ingredients qualify
25 as biological weapons within the meaning of Section 175(c). Section 175(a)
26 provides: “Whoever knowingly assists a foreign state or any organization to do so,
27 or attempts, threatens, or conspires to do the same, shall be fined under this title or
28 imprisoned for life or any term of years, or both”. Defendant legislators have
29 conspired with and have been bribed by the pharmaceutical companies to be the
30 promoters of these toxic poisons to force them upon the citizenry for their own

1 profit and gain and more specifically as alleged in Plaintiffs' First and Second
2 claims for relief in violation of Section 175 – Conspiracy to promote and force
3 inject Plaintiffs' offspring with these biological weapons with the specific intent to
4 injure, maim and or kill the subject individual. As alleged herein above,
5 Defendants have conspired to violated Section 175 Ch. 10 of U.S.C. Title 18 and is
6 therefore liable to Plaintiffs under 18 U.S.C. 1964(a) & (c).

7 **FOURTH CLAIM FOR RELIEF FOR VIOLATION OF 18 U.S.C. § 178,**
8 **CHAPTER 11B- CONSPIRACY TO PROMOTE THE SALE AND USE OF**
9 **CHEMICAL WEAPONS ON CALIFORNIA CITIZENS**
10 **(By Plaintiffs Against All Defendant Legislators)**

11 **161.** Plaintiffs reallege and incorporate in this Fourth Claim for Relief each and
12 every allegation set forth above, as though fully set forth herein.

13
14 **162. Chapter 11B-Section 229, Chemical Weapons:**

15 (a) Unlawful Conduct.—Except as provided in subsection (b), it shall be unlawful
16 for any person knowingly—

17 (1) to develop, produce, otherwise acquire, transfer directly or indirectly, receive,
18 stockpile, retain, own, possess, or use, or threaten to use, any chemical weapon; or

19 (2) to assist or induce, in any way, any person to violate paragraph (1), or to attempt
20 or conspire to violate paragraph (1).

21 **163.** All the Defendant legislators have adequate knowledge of these toxins and
22 risks of exposure to the Plaintiffs and Plaintiffs' offspring. The vaccine ingredients
23 qualify as chemical weapons within the meaning of Section 229 of Chapter 11B.

24 **164.** Defendant legislators have assisted the drug companies in a conspiracy to
25 promote and assist their agents and affiliates (the Superintendent of Schools, Child
26 Protective Services, Local Law Enforcement Agencies, and Health Care
27 Practitioners) in forcing these chemical weapons on Plaintiffs, Plaintiffs' offspring
28 and others similarly situated in violation of Section 229 of Chapter 11B, and as

1 further alleged in Plaintiffs' claims for relief in the First, Second and Third claims
2 for relief. Defendant legislators and their Co-Conspirators qualify as domestic
3 terrorists within the meaning of sections 229 and 175 of this title, and as such, their
4 criminal conduct comes within the purview of the "RICO" laws. And as further
5 alleged in the preceding paragraphs above, Defendants have violated Section 229
6 of Ch. 11B of Title 18 of the U.S. Code and is therefore liable to Plaintiffs under
7 18 U.S.C. 1964(a) & (c).

8
9 **165.** Pursuant to the original Statutes at Large, the "RICO" laws itemized above
10 are to be liberally construed by this honorable Court to effectuate its remedial
11 purpose.

12
13 **FIFTH CLAIM FOR RELIEF FOR VIOLATION OF 18 U.S.C. § 241**
14 **(By Plaintiffs Against All Defendant Legislators)**

15 **166.** Plaintiffs reallege and incorporate in this Fifth Claim for Relief each and
16 every allegation set forth above, as though fully set forth herein.

17
18 **167. Title 18 U.S.C. § 241 provides in pertinent parts:**

19 If two or more citizens conspire to injure, oppress, threaten, or intimidate any
20 citizen in the free exercise or enjoyment of any right or privilege secured to him by
21 the Constitution or laws of the United States, or because of his having so exercised
22 the same; or

23 If two or more citizens go in disguise on the highway, or on the premises of
24 another with intent to prevent or hinder his free exercise or enjoyment of any right
25 or privilege so secured-

26 They shall be fined not more than \$10,000 or imprisoned not more than ten years,
27 or both;

1 **168.** Defendant legislators and their Co-Conspirators through a pattern of
2 racketeering activity, and as alleged in the paragraphs 98 through 174 above and as
3 alleged in the 1st, 2nd, 3rd, and 4th claims for relief, in passing SB277 are in violation
4 of 18 U.S.C. § 241 and are thereby liable to Plaintiffs under 18 U.S.C. § 1964(a) &
5 (c).

6 **SIXTH CLAIM FOR RELIEF FOR VIOLATION OF 18 U.S.C. § 242**
7 **(By Plaintiffs Against All Defendant Legislators)**

8 **169.** Plaintiffs reallege and incorporate in this Sixth Claim for Relief each and
9 every allegation set forth above, as though fully set forth herein.

10 **170. Title 18 U.S.C. § 242 provides in pertinent parts:**

11 Any Citizen, who under color of law, statute, ordinance, regulation, or custom,
12 willfully subjects any inhabitant of any State Territory, or District to the
13 deprivation of any rights, privileges, or immunities secured or protected by the
14 Constitution or laws of the United States, or to different punishments, pains or
15 penalties, on account of such inhabitant being an alien, or by reason of his color, or
16 race, than are prescribed for the punishment of citizens, shall be fined not more
17 than \$1,000 or imprisoned not more than one year or both;
18

19
20 **171.** Defendant legislators and their Co-Conspirators through a pattern of
21 racketeering activity, and as alleged in the paragraphs 98 through 177 above and as
22 alleged in the 1st, 2nd, 3rd, 4th & 5th claims for relief, in passing SB277 are in
23 violation of 18 U.S.C. § 242 and are thereby liable to Plaintiffs under 18 U.S.C. §
24 1964(a) & (c).

25 **SEVENTH CLAIM FOR RELIEF FOR VIOLATION OF 42 U.S.C. § 1983**
26 **(By Plaintiffs Against All Defendant Legislators)**

1 **CONSTITUTIONAL AND STATUTORY PROVISIONS INVOKED UNDER**
2 **THE COMMON LAW AND UCC 1-103.6**

3 **-Judicial Notice Requested-**

4 **The Law, The Court And All Proceedings Must Be in Accordance With The**
5 **U.S. Constitution And The Common Law.**

- 6 1. The assertion of federal rights, when plainly and reasonably made, is not to
7 be defeated under the name of local practice. (Davis v. Wechsler, 263 US
8 22, 24).
- 9 2. The constitution is to be interpreted according to common law rules. Schick
10 v. U.S., 195 US 65, 24 Sup. Ct. 826, 49 L. Ed. 99.
- 11 3. Cohens v Virginia, 6 wheat (19 U.S.) 264, 404 (1821): Chief Justice John
12 Marshall said "We [public servants] have no more right to decline the
13 jurisdiction which is given, than to usurp that which is not given. The one or
14 the other would be treason to the constitution."
- 15 4. Ramsey v. Allegrie, 25 U.S. (12 Wheaton) 611, 631 (1827): "If the common
16 law can try the cause and give full redress, that alone takes away the
17 admiralty jurisdiction."
- 18 5. Hayburn's Case. 2 Dali. (2 U.S.) 409 (1792); Article #6 Clauses 2 and 3,
19 U.S. Constitution: "This Constitution is the supreme Law of the Land. All
20 judicial officers of the united States are bound by oath or affirmation, to
21 support this Constitution.
- 22 6. Boyd v. U.S., 116 U.S. 635 (1886): "Constitutional provisions for the
23 security of person and property should be liberally construed. It is the duty
24 of the courts to be watchful of constitutional rights against any stealthy
25 encroachments thereon."
- 26 7. Norton v. Shelby County 118 USR 425 (1886): "An unconstitutional act is
27 not law. It confers no rights, it imposes no duties, it affords no protections, it
28 creates no office. It is in legal contemplation as inoperative as though it has
never been passed."

1 8. *Miranda v. Arizona* 384 US 436 (1966): "Where rights secured by the
2 constitution are involved, there can be no rule or law making or legislation
3 which would abrogate or abolish them."

4 9. "A legislative act contrary to the Constitution is not law." *Carter v. Carter*
5 *Coal Co.*, 298 U.S. 238.

6 10. "All laws which are repugnant to the Constitution are null and void."
7 *Marbury v. Madison*, 5 U.S. 137,174,176.

8 11. "The claim and exercise of a Constitutional Right cannot be converted into
9 a crime." *Miller v. US.*, 230 F, 2d 286,489.

10 12. "The mere chilling of a Constitutional right by a penalty on its exercise is
11 patently unconstitutional." *Shapiro v. Thompson*, 394 U.S. 618. A law that
12 "impinges upon a fundamental right explicitly or implicitly secured by the
13 Constitution is presumptively unconstitutional." *Mobile v. Bolden*, 446 US
14 55, 76; *Harris v. McRae*, 448 US 297,312.

15 13. A law that improperly infringes on Constitutional Rights is void from its
16 inception and no person can be obligated to obey such a law. 16A *ArnJur2d*
17 *Constitutional Law*, Section 203.

18 14. SB277 as amended and applied is wholly unconstitutional for the above
19 stated lawful case law precedents.

20 15. Plaintiffs assert that SB277 and any statutory laws or state codes related
21 thereto are not applicable, and Plaintiffs are exempt from jurisdiction of said
22 codes except and unless said codes or statutory laws can be proven to be in
23 harmony with the U.S. Constitution and the common law (UCC 1-103.6).

24
25 **172.** Plaintiffs reallege and incorporate in this Seventh Claim for Relief each and
26 every allegation set forth above, as though fully set forth herein.

1 **173.** At all times material herein, there was in full force and effect certain
2 provisions of the Constitution of the United States, namely, U.S. Constitution
3 Amendment 14, § 1 that states in pertinent part as follows:
4

5 ... nor shall any State deprive any person of life, liberty, or property, without due
6 process of law; nor deny to any person within its jurisdiction the equal protection
7 of the laws.
8

9 **174.** At all times material herein, there was in full force and effect certain
10 provisions of the Constitution of the United States, namely, U.S. Constitution
11 Amendment 4, that states in pertinent part as follows:
12

13 The right of the people to be secure in their persons, houses, papers, and effects,
14 against unreasonable searches and seizures, shall not be violated, and no warrants
15 shall issue, but upon probable cause, supported by oath or affirmation, and
16 particularly describing the place to be searched, and the persons or things to be
17 seized.
18

19 **175.** At all times material herein, there was in full force and effect certain
20 provisions of the Constitution of the United States, namely, U.S. Constitution
21 Amendment 5, that states in pertinent part as follows:
22

23 ... nor be deprived of life, liberty, or property, without due process of law; nor
24 shall private property be taken for public use, without just compensation.
25

26 **176.** At all times material herein, there was in full force and effect certain
27 provisions of the Constitution of the United States, namely, U.S. Constitution
28 Amendment 1, that states in pertinent part as follows:

1 Congress shall make no law respecting an establishment of religion, or prohibiting
2 the free exercise thereof; or abridging the freedom of speech, or of the press; or the
3 right of the people peaceably to assemble, and to petition the government for a
4 redress of grievances.

5
6 **177.** At all times material herein, there was also in full force and effect a certain
7 statute of the United States known as the Civil Rights Act of 1871, 42 U.S.C.A. §
8 1983, which provides, in pertinent part as follows:

9
10 Every person who, under color of any statute, ordinance, regulation, custom, or
11 usage, of any State or Territory or the District of Columbia, subjects, or causes to
12 be subjected, any citizen of the United States or other person within the jurisdiction
13 thereof to the deprivation of any rights, privileges, or immunities secured by the
14 Constitution and laws shall be liable to the party injured in an action at law, suit in
15 equity, or other proper proceeding for redress.

16
17 **178.** At all times material herein, there was also in full force and effect a certain
18 statute of the United States known as the Civil Rights Act of 1871, 42 U.S.C.A. §
19 1986, which provides, in pertinent part as follows:

20
21 Every person who, having knowledge that any of the wrongs conspired to be done,
22 and mentioned in section 1985 of this title, are about to be committed, and having
23 power to prevent or aid in preventing the commission of the same, neglects or
24 refuses so to do, if such wrongful act be committed, shall be liable to the party
25 injured, or his legal representatives, for all damages caused by such wrongful act,
26 which such person by reasonable diligence could have prevented; and such
27 damages may be recovered in an action on the case; and any number of persons
28 guilty of such wrongful neglect or refusal may be joined as defendants in the

1 action; and if the death of any party be caused by any such wrongful act and
2 neglect, the legal representatives of the deceased shall have such action therefor,
3 and may recover not exceeding \$5,000 damages therein, for the benefit of the
4 widow of the deceased, if there be one, and if there be no widow, then for the
5 benefit of the next of kin of the deceased. But no action under the provisions of this
6 section shall be sustained which is not commenced within one year after the cause
7 of action has accrued.
8

9 **179.** In order to establish personal liability part of government official in federal
10 civil rights law action, under Title 42 U.S.C. §1983, it is enough to show that
11 official acting under color of law caused deprivation of Constitutional Right in
12 contrast. Government entity is liable in official capacity suit under Title 42 U.S.C.
13 only when entity is moving force behind deprivation. Thus requiring entity policy
14 or custom to have played a part in violation of Federal law. Ref. Kentucky V.
15 Graham 1985 475, US 159 85 L.Ed. 2d. 114, 105 S. Ct. 3099.
16

17 **180.** Defendant legislators have long established a policy, custom and usage of
18 violating their oaths of office to pass unconstitutional laws directed at stripping the
19 constitutional rights of Plaintiffs and others similarly situated.
20

21 **Count 1**

22 **181.** The First Amendment to the U.S. Constitution secures Plaintiffs the right to
23 religious or personal freedoms. In passing SB277 Plaintiffs' offspring would be
24 barred from entering public schools unless and until they have complied with ALL
25 the required CDC scheduled vaccinations. Plaintiffs and their offspring would be
26 required to waive their rights under their deeply held spiritual beliefs and training
27 to comply with SB277. Defendant legislators violated Plaintiffs' protected rights
28

1 under the First Amendment to the U.S. Constitution and is therefore liable to
2 Plaintiffs under 42 U.S.C. § 1983 and the common law.

3 **Count 2**

4 **182.** Article 1 Section 4 of the California constitution guarantees Plaintiffs' the
5 free exercise and enjoyment of religious freedom without discrimination or
6 preference. SB277 would preclude Plaintiffs and their offspring from invoking
7 their rights of religious freedoms under California law to be in compliance with its
8 mandate. In passing SB277 Defendant legislators have discriminated against
9 Plaintiffs and their offspring with respect to Plaintiffs' protected rights under the
10 First Amendment to the U.S. Constitution and Art. 1 Sec. 4 of the California
11 constitution and is therefore liable to Plaintiffs under 42 U.S.C. § 1983 and the
12 common law.

13 **Count 3**

14 **183.** The Fourth Amendment to the U.S. constitution provides for the right of the
15 people to be secure in their persons, houses, papers, and effects, against
16 unreasonable searches and seizures, shall not be violated, and no warrants shall
17 issue, but upon probable cause, supported by oath or affirmation, and particularly
18 describing the place to be searched, and the persons or things to be seized.

19
20 **184.** SB277 would preclude Plaintiffs and their offspring from invoking their
21 rights of privacy with respect to the disclosure of their medical information to
22 school officials. In turn the school officials would use this information for the sole
23 purpose of reporting this information to the local law enforcement agencies and or
24 Child Protective Services for initiating criminal prosecutions against Plaintiffs and
25 other parents of partially or unvaccinated offspring. Plaintiffs and their offspring
26 would be required to waive their rights of privacy and the right to be let alone
27 under the Fourth Amendment in order to comply with SB277. Defendant
28 legislators in enacting SB277 have violated Plaintiffs' protected rights under the

1 Fourth Amendment to the U.S. Constitution and is therefore liable to Plaintiffs
2 under 42 U.S.C. § 1983 and the common law.

3 **Count 4**

4 **185.** SB277 violates Plaintiffs and their offspring's rights under the Fifth
5 Amendment to the U.S. constitution in that the unwanted injections of poisons into
6 their offspring is considered a felony assault with intent to do serious harm,
7 including but not limited to maiming and or killing the individual. Under the Fifth
8 Amendment, Plaintiffs and their offspring have the right not to be maimed, injured
9 in their health or killed without due process of law.

10
11 **186.** The right of self-defense and self-preservation is natural right long precedent
12 to the U. S. Constitution.

13 Self-defense as stated by Justice Blackstone of "Blackstone's Commentaries On
14 English Common Law":

15 "The defense of one's self, or the mutual and reciprocal defense of such as stand in
16 the relations of husband and wife, parent and child, master and servant. In these
17 cases, if the party himself or any of these his relations, be forcibly attacked in his
18 person or property, it is lawful for him to repel force by force; and the breach of
19 the peace, which happens, is chargeable upon him only who began the affray. For
20 the law, in this case, respects the passions of the human mind; and (when external
21 violence is offered to a man himself, or those to whom he bears a near connection)
22 makes it lawful in him to do himself that immediate justice, to which he is
23 prompted by nature, and which no prudential motives are strong enough to restrain.
24 It considers that the future process of law is by no means an adequate remedy for
25 injuries accompanied with force; since it is impossible to say to what wanton
26 lengths of rapine or cruelty outrages of this sort might be carried, unless it were
27 permitted a man immediately to oppose one violence with another. Self-defense,
28 therefore, as it is justly called the primary law of nature, so it is not, neither can it

1 be in fact, taken away by the law of society. In the English law particularly it is
2 held an excuse for breaches of the peace, nay even for homicide itself.”

3 *-Blackstone’s Commentaries Book 2 pages 1491 & 1493.*

4
5 **187.** Defendant legislators in enacting SB277 have violated Plaintiffs’ protected
6 rights under the Fifth Amendment to the U.S. Constitution and is therefore liable to
7 Plaintiffs under 42 U.S.C. § 1983 and the common law.

8 **Count 5**

9 **188.** In passing SB277 Plaintiffs’ offspring would be barred from entering public
10 schools unless and until they have complied with ALL the required CDC
11 scheduled vaccinations. In short, SB277 discriminates against Plaintiffs’ offspring
12 due to the status of their vaccination schedules not their state of health at the time
13 of entering school. This is a direct violation of the Fourteenth Amendment to the
14 U.S. constitution is therefore actionable under 42 U.S.C. § 1983, and Defendant
15 legislators therefore liable to Plaintiffs under 42 U.S.C. § 1983 and the common
16 law.

17 **EIGHTH CLAIM FOR RELIEF FOR VIOLATION OF 42 U.S.C. § 1986**
18 **(By Plaintiffs Against All Defendant Legislators)**

19 **189.** Plaintiffs reallege and incorporate in this Eighth Claim for Relief each and
20 every allegation set forth above, as though fully set forth herein

21
22 **190.** 42 U.S.C.A. § 1986, which provides, in pertinent part as follows:
23 Every person who, having knowledge that any of the wrongs conspired to be done,
24 and mentioned in section 1985 of this title, are about to be committed, and having
25 power to prevent or aid in preventing the commission of the same, neglects or
26 refuses so to do, if such wrongful act be committed, shall be liable to the party
27 injured, or his legal representatives, for all damages caused by such wrongful act,
28 which such person by reasonable diligence could have prevented; and such

1 damages may be recovered in an action on the case; and any number of persons
2 guilty of such wrongful neglect or refusal may be joined as defendants in the
3 action;

4 **Count 6**

5 **191.** Each and every Defendant legislator along with Defendant Edmund Brown
6 on behalf of the Defendant State of California agreed to join the conspiracy and
7 acted in concert with one another in violating the civil and constitutional rights of
8 the Plaintiffs and their offspring, particularly as plead in paragraphs 98 through
9 199 herein above. Defendant legislators had knowledge that the wrongs were about
10 to occur, and having power to prevent them, neglected or refused to intervene to
11 prevent the violations from occurring in violation of 42 U.S.C. §1986. Defendant
12 legislators are therefore liable to Plaintiffs under 42 U.S.C. § 1983, 1986 and the
13 common law.

14 **Count 7**

15 **Violation of The Thirteenth Amendment To The U.S. Constitution by**
16 **Defendant Legislators**

17
18 **192.** The Thirteenth Amendment provides;
19 "Neither slavery nor involuntary servitude, except as a punishment for crime
20 whereof the party shall have been duly convicted, shall exist within the United
21 States, or any place subject to their jurisdiction." Formally abolishing slavery in the
22 United States, the 13th Amendment was passed by the Congress on January 31,
23 1865, and ratified by the states on December 6, 1865.

24
25 **193.** The mandatory requirement that Plaintiffs and their offspring comply with
26 an unlawful tyrannical law puts Plaintiffs and others similarly situated in a
27 perpetual state of civil enslavement at the whims of Defendant State of California
28 and its agencies in violation of the 13th Amendment to the U.S. constitution. The

1 passage of SB277 violates Plaintiffs' and their offspring's rights constitutionally,
2 and thus Defendants are liable to Plaintiffs under 42 U.S.C. § 1983.

3
4 **NINTH CLAIM FOR RELIEF FOR INTENTIONAL INFLICTION OF**
5 **EMOTIOANAL DISTRESS**
6 **(By Plaintiffs Against All Defendants)**

7 **194.** Plaintiffs reallege and incorporate in this Eighth Claim for Relief each and
8 every allegation set forth above, as though fully set forth herein.

9
10 **195.** As an actual and proximate cause of Defendants actions, Plaintiffs have
11 suffered severe emotional distress, including but not limited to lack of sleep,
12 anxiety, irritability, anger and sorrow. As a result of Defendants' wrongful acts
13 and/or omissions, Plaintiffs are entitled to various remedies including, but not
14 limited to, reimbursement, equitable recoupment, indemnification, damages
15 (statutory, actual, punitive and/or treble damages), attorney's fees and cost and
16 injunctive relief for the undue emotional distress caused by the Defendants.

17 **PRAYER FOR RELIEF**

18 WHEREFORE, Plaintiffs pray for judgment against the Defendants, and each
19 of them, as follows:

20
21 **ON THE FIRST CLAIM FOR RELIEF**

- 22 1. For treble the amount of actual damages in an amount to be determined
23 according to proof at trial;
- 24 2. For reasonable attorneys' fees pursuant to 18 U.S.C. § 1964(c);
- 25 3. For an Order enjoining and prohibiting Defendants, and each of them, from
26 further engaging in the racketeering conduct as described in this Complaint;
- 27
28

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ON THE SECOND CLAIM FOR RELIEF

- 4. For treble the amount of actual damages in an amount to be determined according to proof at trial;
- 5. For reasonable attorneys' fees pursuant to 18 U.S.C. § 1964(c);
- 6. For an Order enjoining and prohibiting Defendants, and each of them, from further engaging in the racketeering conduct as described in this Complaint;

ON THE THIRD CLAIM FOR RELIEF

- 7. For treble the amount of actual damages in an amount to be determined according to proof at trial;
- 8. For reasonable attorneys' fees pursuant to 18 U.S.C. § 1964(c);
- 9. For an Order enjoining and prohibiting Defendants, and each of them, from further engaging in the racketeering conduct as described in this Complaint;

ON THE FOURTH CLAIM FOR RELIEF

- 10. For treble the amount of actual damages in an amount to be determined according to proof at trial;
- 11. For reasonable attorneys' fees pursuant to 18 U.S.C. § 1964(c);
- 12. For an Order enjoining and prohibiting Defendants, and each of them, from further engaging in the racketeering conduct as described in this Complaint;

ON ALL CLAIMS FOR RELIEF

- 13. For restitution to all Plaintiffs in an amount \$25,000 against each Defendant on each claim for relief and each count;
- 14. For a temporary, preliminary and permanent injunction, pursuant to 28 U.S.C. Section 2201, enjoining and restraining Defendant legislators and the Defendant State of California, its employees, servants, agents, affiliates, distributors, dealers, members, attorneys, successors and/or assigns, and all

1 persons in active concert or participation with any of them, in enforcing
2 SB277 on Plaintiffs, Plaintiffs' offspring and those similarly situated within
3 this state;

4 15. For a declaratory Order that SB277 is void for want of lawful enactment due
5 to its repugnance to the First, Fourth, Fifth, Ninth, and Fourteenth
6 Amendments to the united States Constitution;

7 16. For a declaratory Order that all named Defendants be required to take **all** of
8 the CDC's 70 scheduled inoculations; to be completed within a 48 hour
9 time-period, and that such shots be administered by Dr. Brian Hooker and
10 Dr. Jim Sears.

11 17. For reasonable attorneys' fees to the full extent permitted under "RICO".

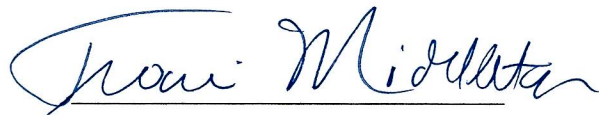
12 18. That all issues so triable be tried to a 7th Amendment jury at common law;

13 19. For costs of suit incurred herein; and

14 20. For such other and further relief as this Court deems just and proper.

15
16 Dated: May 29, 2016

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19
20 Respectfully Submitted,



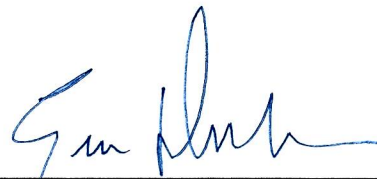
21 Travis Middleton
22 27 West Anapamu # 153
23 Santa Barbara, California 93101
24 Private Attorney General, ex rel.
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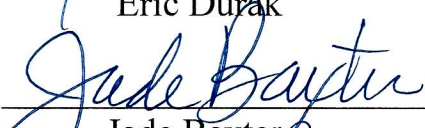
VERIFICATION

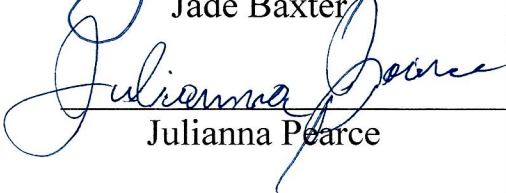
We, Eric Durak, Jade Baxter, Julianna Pearce, Candace Estave, Denise Michelle Derusha, Melissa Christou, Andrea Lewis, Rachil Vincent, Jackie Kozak, Don Demanlevesde, Jessica Haas, Paige Murphy, Christie Macias, Lori Strantz, Anwanur Gielow, Lisa Ostendorf, Julia Anne Whitney, Pam Corner, Jodie Trsserand, Andy Taff, Alice Tropper, Bret Nielsen, Brent Haas, Murid Rosensweet, and Marina Read are Plaintiffs and Parties Injured in the above-titled action. We have read the foregoing Complaint and know the contents thereof. The same is true of our own knowledge, except as to those matters which are therein alleged on information and belief, and as to those matters, we believe them to be true.

I/we declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Santa Barbara, California.

Dated this 29th day of May, 2016


 Eric Durak


 Jade Baxter

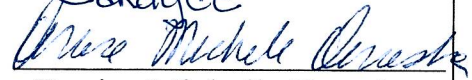

 Julianna Pearce

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Candace Estave

Candace



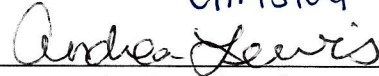
Denise Michelle Derusha

Michele



Melissa Christian

Christou



Andrea Lewis



Rachil Vincent



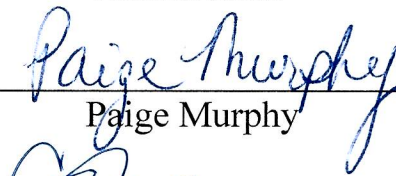
Jackie Kozak



Don Demanlevesde



Jessica Haas



Paige Murphy



Christie Macias

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[Redacted]

Lori Strantz

Lori Strantz

Anwanur Gielow

Anwanur Gielow

Lisa Ostendorf

Lisa Ostendorf

[Redacted]

[Redacted]

Julia Anne Whitney

Julia Anne Whitney

Pam Corner

Pam Corner

~~*[Redacted Signature]*~~

[Redacted]

Jodie Trsstrand

Tisserand

Jodie Trsstrand

Andy Taff

Andy Taff

[Redacted]

Alice Tropper

Alice Tropper

[Redacted]

Bret Nielsen

Bret Nielsen

Brent Haas

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Muriel Rosensweet

Muriel Rosensweet
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Marina Read

Marina Read

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VERIFICATION

I, Travis Middleton, am a Plaintiff and Private Attorney General, ex rel. in the above-titled action. I have read the foregoing Complaint and know the contents thereof. The same is true of my own knowledge, except as to those matters which are therein alleged on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Santa Barbara, California.

Dated this 29th day of May, 2016

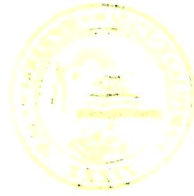


Travis Middleton

Private Attorney General, ex rel.

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EXHIBIT A



OFFICE OF THE GOVERNOR

June 30, 2015

To the Members of the California State Senate:

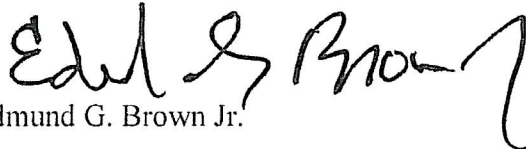
SB 277 has occasioned widespread interest and controversy – with both proponents and opponents expressing their positions with eloquence and sincerity. After carefully reviewing the materials and arguments that have been presented, I have decided to sign this bill.

The science is clear that vaccines dramatically protect children against a number of infectious and dangerous diseases. While it's true that no medical intervention is without risk, the evidence shows that immunization powerfully benefits and protects the community.

The Legislature, after considerable debate, specifically amended SB 277, to exempt a child from immunizations whenever the child's physician concludes that there are "circumstances, including but not limited to, family medical history, for which the physician does not recommend immunization..."

Thus, SB 277, while requiring that school children be vaccinated, explicitly provides an exception when a physician believes that circumstances – in the judgement and sound discretion of the physician – so warrant.

Sincerely,


Edmund G. Brown Jr.

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

I. (a) PLAINTIFFS (Check box if you are representing yourself <input checked="" type="checkbox"/>) Travis Middleton, et al.	DEFENDANTS (Check box if you are representing yourself <input type="checkbox"/>) Richard Pan, et al.
(b) County of Residence of First Listed Plaintiff <u>Santa Barbara</u> (EXCEPT IN U.S. PLAINTIFF CASES)	County of Residence of First Listed Defendant <u>Sacramento</u> (IN U.S. PLAINTIFF CASES ONLY)
(c) Attorneys (Firm Name, Address and Telephone Number) If you are representing yourself, provide the same information. 27 West Anapamu Street No. 153 Santa Barbara, California [93101]	Attorneys (Firm Name, Address and Telephone Number) If you are representing yourself, provide the same information. UNKNOWN AT THIS TIME.

II. BASIS OF JURISDICTION (Place an X in one box only.) <input type="checkbox"/> 1. U.S. Government Plaintiff <input type="checkbox"/> 2. U.S. Government Defendant <input checked="" type="checkbox"/> 3. Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 4. Diversity (Indicate Citizenship of Parties in Item III)	III. CITIZENSHIP OF PRINCIPAL PARTIES -For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant) <table style="width:100%; border: none;"> <tr> <td style="border: none;">Citizen of This State</td> <td style="border: none; text-align: center;">PTF DEF</td> <td style="border: none;"> <input checked="" type="checkbox"/> 1 <input type="checkbox"/> 1 </td> <td style="border: none;">Incorporated or Principal Place of Business in this State</td> <td style="border: none; text-align: center;">PTF DEF</td> <td style="border: none;"> <input type="checkbox"/> 4 <input checked="" type="checkbox"/> 4 </td> </tr> <tr> <td style="border: none;">Citizen of Another State</td> <td style="border: none; text-align: center;">PTF DEF</td> <td style="border: none;"> <input type="checkbox"/> 2 <input type="checkbox"/> 2 </td> <td style="border: none;">Incorporated and Principal Place of Business in Another State</td> <td style="border: none; text-align: center;">PTF DEF</td> <td style="border: none;"> <input type="checkbox"/> 5 <input type="checkbox"/> 5 </td> </tr> <tr> <td style="border: none;">Citizen or Subject of a Foreign Country</td> <td style="border: none; text-align: center;">PTF DEF</td> <td style="border: none;"> <input type="checkbox"/> 3 <input type="checkbox"/> 3 </td> <td style="border: none;">Foreign Nation</td> <td style="border: none; text-align: center;">PTF DEF</td> <td style="border: none;"> <input type="checkbox"/> 6 <input type="checkbox"/> 6 </td> </tr> </table>	Citizen of This State	PTF DEF	<input checked="" type="checkbox"/> 1 <input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	PTF DEF	<input type="checkbox"/> 4 <input checked="" type="checkbox"/> 4	Citizen of Another State	PTF DEF	<input type="checkbox"/> 2 <input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	PTF DEF	<input type="checkbox"/> 5 <input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	PTF DEF	<input type="checkbox"/> 3 <input type="checkbox"/> 3	Foreign Nation	PTF DEF	<input type="checkbox"/> 6 <input type="checkbox"/> 6
Citizen of This State	PTF DEF	<input checked="" type="checkbox"/> 1 <input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	PTF DEF	<input type="checkbox"/> 4 <input checked="" type="checkbox"/> 4														
Citizen of Another State	PTF DEF	<input type="checkbox"/> 2 <input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	PTF DEF	<input type="checkbox"/> 5 <input type="checkbox"/> 5														
Citizen or Subject of a Foreign Country	PTF DEF	<input type="checkbox"/> 3 <input type="checkbox"/> 3	Foreign Nation	PTF DEF	<input type="checkbox"/> 6 <input type="checkbox"/> 6														

IV. ORIGIN (Place an X in one box only.)

1. Original Proceeding
 2. Removed from State Court
 3. Remanded from Appellate Court
 4. Reinstated or Reopened
 5. Transferred from Another District (Specify)
 6. Multidistrict Litigation - Transfer
 8. Multidistrict Litigation - Direct File

V. REQUESTED IN COMPLAINT: JURY DEMAND: Yes No (Check "Yes" only if demanded in complaint.)

CLASS ACTION under F.R.Cv.P. 23: Yes No **MONEY DEMANDED IN COMPLAINT:** \$ 31,200,000.00

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)
 R.I.C.O., Conspiracy to Obstruct Justice - 18 U.S.C. 1962 & 1503; Extortion of Liberty - 18 U.S.C. 1951; Racketeering - 18 U.S.C. 1952

VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES	CONTRACT	REAL PROPERTY CONT.	IMMIGRATION	PRISONER PETITIONS	PROPERTY RIGHTS
<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/Etc. <input type="checkbox"/> 460 Deportation <input checked="" type="checkbox"/> 470 Racketeer Influenced & Corrupt Org. <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Admin. Procedures Act/Review of Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes	<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Vet.) <input type="checkbox"/> 153 Recovery of Overpayment of Vet. Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property TORTS PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions TORTS PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 American with Disabilities-Employment <input type="checkbox"/> 446 American with Disabilities-Other <input type="checkbox"/> 448 Education	Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee Conditions of Confinement FORFEITURE/PENALTY <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Ret. Inc. Security Act	<input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405 (g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405 (g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609

LA CV 16 05224-SVW-AGR

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

VIII. VENUE: Your answers to the questions below will determine the division of the Court to which this case will be initially assigned. This initial assignment is subject to change, in accordance with the Court's General Orders, upon review by the Court of your Complaint or Notice of Removal.

<p>QUESTION A: Was this case removed from state court? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If "no," skip to Question B. If "yes," check the box to the right that applies, enter the corresponding division in response to Question E, below, and continue from there.</p>	<p align="center">STATE CASE WAS PENDING IN THE COUNTY OF</p> <p><input type="checkbox"/> Los Angeles, Ventura, Santa Barbara, or San Luis Obispo</p> <p><input type="checkbox"/> Orange</p> <p><input type="checkbox"/> Riverside or San Bernardino</p>	<p align="center">INITIAL DIVISION IN CACD IS</p> <p align="center">Western</p> <p align="center">Southern</p> <p align="center">Eastern</p>	
<p>QUESTION B: Is the United States, or one of its agencies or employees, a PLAINTIFF in this action? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If "no," skip to Question C. If "yes," answer Question B.1, at right.</p>	<p>B.1. Do 50% or more of the defendants who reside in the district reside in Orange Co.? <i>check one of the boxes to the right</i> →</p> <p>B.2. Do 50% or more of the defendants who reside in the district reside in Riverside and/or San Bernardino Counties? (Consider the two counties together.) <i>check one of the boxes to the right</i> →</p>	<p><input type="checkbox"/> YES. Your case will initially be assigned to the Southern Division. Enter "Southern" in response to Question E, below, and continue from there.</p> <p><input type="checkbox"/> NO. Continue to Question B.2.</p> <p><input type="checkbox"/> YES. Your case will initially be assigned to the Eastern Division. Enter "Eastern" in response to Question E, below, and continue from there.</p> <p><input type="checkbox"/> NO. Your case will initially be assigned to the Western Division. Enter "Western" in response to Question E, below, and continue from there.</p>	
<p>QUESTION C: Is the United States, or one of its agencies or employees, a DEFENDANT in this action? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If "no," skip to Question D. If "yes," answer Question C.1, at right.</p>	<p>C.1. Do 50% or more of the plaintiffs who reside in the district reside in Orange Co.? <i>check one of the boxes to the right</i> →</p> <p>C.2. Do 50% or more of the plaintiffs who reside in the district reside in Riverside and/or San Bernardino Counties? (Consider the two counties together.) <i>check one of the boxes to the right</i> →</p>	<p><input type="checkbox"/> YES. Your case will initially be assigned to the Southern Division. Enter "Southern" in response to Question E, below, and continue from there.</p> <p><input type="checkbox"/> NO. Continue to Question C.2.</p> <p><input type="checkbox"/> YES. Your case will initially be assigned to the Eastern Division. Enter "Eastern" in response to Question E, below, and continue from there.</p> <p><input type="checkbox"/> NO. Your case will initially be assigned to the Western Division. Enter "Western" in response to Question E, below, and continue from there.</p>	
<p>QUESTION D: Location of plaintiffs and defendants?</p> <p>Indicate the location(s) in which 50% or more of <i>plaintiffs who reside in this district</i> reside. (Check up to two boxes, or leave blank if none of these choices apply.)</p> <p>Indicate the location(s) in which 50% or more of <i>defendants who reside in this district</i> reside. (Check up to two boxes, or leave blank if none of these choices apply.)</p>	<p>A. Orange County</p> <p align="center"><input type="checkbox"/></p>	<p>B. Riverside or San Bernardino County</p> <p align="center"><input type="checkbox"/></p>	<p>C. Los Angeles, Ventura, Santa Barbara, or San Luis Obispo County</p> <p align="center"><input checked="" type="checkbox"/></p>
<p>D.1. Is there at least one answer in Column A? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If "yes," your case will initially be assigned to the SOUTHERN DIVISION. Enter "Southern" in response to Question E, below, and continue from there. If "no," go to question D2 to the right. →</p>	<p>D.2. Is there at least one answer in Column B? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If "yes," your case will initially be assigned to the EASTERN DIVISION. Enter "Eastern" in response to Question E, below. If "no," your case will be assigned to the WESTERN DIVISION. Enter "Western" in response to Question E, below. ↓</p>		
<p>QUESTION E: Initial Division?</p> <p>Enter the initial division determined by Question A, B, C, or D above: →</p>	<p align="center">INITIAL DIVISION IN CACD</p> <p align="center">WESTERN</p>		
<p>QUESTION F: Northern Counties?</p> <p>Do 50% or more of plaintiffs or defendants in this district reside in Ventura, Santa Barbara, or San Luis Obispo counties? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>			

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

IX(a). IDENTICAL CASES: Has this action been previously filed in this court? NO YES

If yes, list case number(s): _____

IX(b). RELATED CASES: Is this case related (as defined below) to any civil or criminal case(s) previously filed in this court? NO YES

If yes, list case number(s): _____

Civil cases are related when they (check all that apply):

- A. Arise from the same or a closely related transaction, happening, or event;
- B. Call for determination of the same or substantially related or similar questions of law and fact; or
- C. For other reasons would entail substantial duplication of labor if heard by different judges.

Note: That cases may involve the same patent, trademark, or copyright is not, in itself, sufficient to deem cases related.

A civil forfeiture case and a criminal case are related when they (check all that apply):

- A. Arise from the same or a closely related transaction, happening, or event;
- B. Call for determination of the same or substantially related or similar questions of law and fact; or
- C. Involve one or more defendants from the criminal case in common and would entail substantial duplication of labor if heard by different judges.

X. SIGNATURE OF ATTORNEY

(OR SELF-REPRESENTED LITIGANT): Joan Middleton DATE: _____

Notice to Counsel/Parties: The submission of this Civil Cover Sheet is required by Local Rule 3-1. This Form CV-71 and the information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. For more detailed instructions, see separate instruction sheet (CV-071A).

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405 (g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))