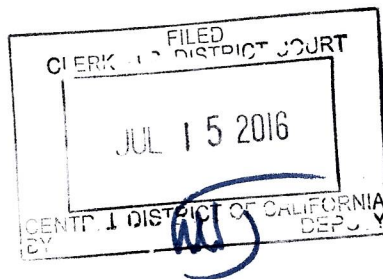


1 Travis Middleton
2 27 West Anapamu Street No. 153
3 Santa Barbara, California 93101
4 Travis_m_93101@yahoo.com
5 (805) 284-6562
6 "Private Attorney General" Ex Rel.



7 LA CV 16 05224-SVW-
8 AGR

9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA
11 WESTERN DIVISION

11 Travis Middleton, "Private Attorney
12 General" Ex Rel., Eric Durak, Jade
13 Baxter, Julianna Pearce, Candyce
14 Estave, Denise Michelle Derusha,
15 Melissa Christou, Andrea Lewis, Rachil
16 Vincent, Jackie Kozak, Don
17 Demanlevesde, Jessica Haas, Paige
18 Murphy, Christie Macias, Lori Strantz,
19 Anwanur Gielow, Lisa Ostendorf,
20 JuliaAnne Whitney, Pam Corner, Jodie
21 Trsserand, Andy Taft, Alice Tropper,
22 Bret Nielsen, Brent Haas, Murid
23 Rosensweet, Marina Read,

24 Plaintiffs,

25 vs.

26 Richard Pan, Win-Li Wang, Martin
27 Jeffrey "Marty" Block, Cindy Block,
28 Gerald A. "Jerry" Hill, Sky Hill, Holly
Mitchell, Catharine Baker, Dan Baker,
Christina Garcia, Adrin Nazarian, Diana
Nazarian, Jim Wood, Jane Wood, Ben
Allen, Kevin de Leon, Hannah-Beth
Jackson, George Eskin, Jeff Stone,
Richard Bloom, Robbie Black, Bill

Incorporated Case No.:

VERIFIED COMPLAINT FOR:

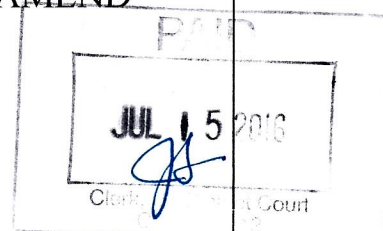
1. VIOLATION OF THE
RACKETEERING INFLUENCED
AND CORRUPT ORGANIZATIONS
ACT ("RICO") 18 U.S.C. §§ 1961,
1962(a)(b)(c), 1964 (a)(c);

- a). 1503-Obstruction of Justice
- b). 1952-Racketeering
- c). 1951- Extortion of Liberty Under Color of Official Right
- d). 175-178- Illegal Use of Biological Weapons
- e). 229-229F- Illegal Use of Chemical Weapons

42 U.S.C. §§ 1983 & 1986

COMMON LAW JURISDICTION
UCC 1-103.6

DEMAND FOR JURY TRIAL
REQUEST LEAVE TO AMEND



1 Quirk, Laurel Quirk, Lorena Gonzalez,)
 2 Reginald Jones-Sawyer, Isadore Hall,)
 3 Mark Leno, Douglas Jackson, Bob)
 4 Wieckowski, Sue Lemke, David Chiu,)
 5 Candace Chen, Evan Low, Anthony)
 6 Rendon, Annie Lam, Jim Beall, Robert)
 7 Hertzberg, Mike McGuire, Erika)
 8 McGuire, Lois Wolk, Bruce Wolk, Jim)
 9 Cooper, Kristen Cooper, Kevin)
 10 McCarthy, Judy McCarthy, Mark Stone,)
 11 Kathy Stone, Edmund G. Brown Jr.,)
 12 Anne Gust, The State of California and)
 13 DOES 1 through 10,)

14 Defendants.

15 *(Defendant Legislators are sued in their*
 16 *individual & official capacities)*

17 **COMPLAINT**

18 COMES NOW Plaintiff Travis Middleton, Private Attorney General, Ex
 19 Rel, bringing this Incorporated Case for the people of the united States of
 20 America, under the American Flag of peace, without an attorney, ex rel. and
 21 states:

22 Ex rel.: for the people of the united states; "...But it is the manner of enforcement
 23 which gives Title 42 U.S.C. 1983 its unique importance, for the enforcement is
 24 placed in the hands of the people." Each citizen "acts as a private attorney
 25 general who takes on the mantle of the sovereign, guarding for all of us the
 26 individual liberties enunciated in the constitution." Section 1983 represents a
 27 balancing feature in our government structure whereby individual citizens are
 28 encouraged to police those who are charged with policing us all. Thus, it is of

1 special importance that suits brought under this statute be resolved by a
2 determination of truth.” Wood v. Breir, 54 F.R.D. 7, (1972).

3 Both statutes [RICO and Clayton Act] bring to bear the pressure of “private
4 attorneys general” on a serious national problem for which public prosecutorial
5 resources are deemed inadequate; the mechanism chosen to reach the objective in
6 both the Clayton Act and RICO is the carrot of treble damages. [Agency Holding
7 Corp. v. Malley-Duff & Associates][107 S.Ct. 2759, 483 U.S. 143, 151
8 (1987)][bold emphasis added]. In rejecting a significantly different focus under
9 RICO, therefore, we are honoring an analogy that Congress itself accepted and
10 relied upon, and one that promotes the objectives of civil RICO as readily as it
11 furthers the objects of the Clayton Act. Both statutes share a common
12 congressional objective of encouraging civil litigation to supplement Government
13 efforts to deter and penalize the respectively prohibited practices.

14 The object of civil RICO is thus not merely to compensate victims but to
15 turn them into prosecutors, "private attorneys general," dedicated to eliminating
16 racketeering activity. ³ *Id.*, at 187 (citing *Malley-Duff*, 483 U.S., at 151). (Civil
17 RICO specifically has a "further purpose [of] encouraging potential private
18 plaintiffs diligently to investigate"). The provision for treble damages is
19 accordingly justified by the expected benefit of suppressing racketeering activity,
20 an object pursued the sooner the better. [Rotella v. Wood et al., 528 U.S. 549
21 (2000)] [bold and underline emphases added]. This Incorporated Case affirms
22 evidence of multiple constitutional and civil right violations pursuant to 42 USC
23 1983, which has inflicted irreparable harm on Citizens of the State of California,
24 all of the above named Plaintiffs and upon Travis Middleton, Parties Injured.
25 This Incorporated Case may identify acts prohibited under 18 U.S.C. 1961
26 through 18 U.S.C. 1964 and by enforcement, committing the undersigned into
27 “involuntary servitude” in violation of the Thirteenth Amendment to the United
28

1 States Constitution and or under “full faith and credit” of the united States of
2 America.

3 Definition: “Case Incorporated”, the formation of a legal body, with the quality
4 of perpetual existence and succession. (2). Consisting of an association of
5 numerous individuals. (3). Matters relating to the common purpose of the
6 association, within the scope of the powers and authorities conferred upon such
7 bodies with the quality of perpetual existence and successions. Ref. Black’s Law
8 Dictionary 67th Pg. 690. “Case Incorporation” will establish the legal bounds of
9 the members of this lawful assembly to solve a specific “Case Number” and the
10 issues in motion.

11 Additionally, all of the above named Plaintiffs in the above-captioned
12 matter submit their Complaint as follows:

13
14 **STATEMENT OF THE CASE**

15
16 -When injustice becomes law, rebellion becomes duty-.

17
18 In 1932 the U.S. Public Health Service began a study of the natural
19 progression of untreated syphilis in rural African-American men in Alabama
20 under the auspices of receiving free health care from the United States
21 government. It was called the "Tuskegee Study of Untreated Syphilis in the
22 Negro Male." The study initially involved 600 black men – 399 with syphilis,
23 201 who did not have the disease. The study was conducted without the benefit
24 of patients' informed consent. Researchers told the men they were being treated
25 for "bad blood," a local term used to describe several ailments, including syphilis,
26 anemia, and fatigue. In truth, they did not receive the proper treatment needed to
27 cure their illness. In exchange for taking part in the study, the men received free
28 medical exams, free meals, and burial insurance. Although originally projected to

1 last 6 months, the study actually went on for 40 years and ended officially in
2 1972. Their doctors had no intention of curing them of syphilis at all. The data
3 for the experiment was to be collected from autopsies of the men, and they were
4 thus deliberately left to degenerate under the ravages of tertiary syphilis—which
5 can include tumors, heart disease, paralysis, blindness, insanity, and death. “As I
6 see it,” one of the doctors involved explained, “we have no further interest in
7 these patients until they die.” In the summer of 1973, an attorney named Fred
8 Gray filed a class-action lawsuit on behalf of the study participants and their
9 families. In 1974, a \$10 million out-of-court settlement was reached. As part of
10 the settlement, the U.S. government promised to give lifetime medical benefits
11 and burial services to all living participants. The Tuskegee Health Benefit
12 Program (THBP) was established to provide these services. In 1975, wives,
13 widows and offspring were added to the program. In 1995, the program was
14 expanded to include health as well as medical benefits. The Centers for Disease
15 Control and Prevention was given responsibility for the program, where it
16 remains today in the National Center for HIV/AIDS, Viral Hepatitis, STD, and
17 TB Prevention. The last study participant died in January 2004. The last widow
18 receiving THBP benefits died in January 2009. On June 13 of 2015 the State of
19 California implemented a new version of The Tuskegee Experiment. It is now
20 known as bill *SB277*. The California Vaccine Mandate. See attached as *Exhibit*
21 *A*. All of the named Defendants knew before hand of the toxic list of ingredients
22 that are in these inoculations including but not limited to:
23 aluminum hydroxide, aluminum phosphate, ammonium sulfate, amphotericin B,
24 animal tissues: (pig blood, horse blood, rabbit brain), dog kidney, monkey
25 kidney, chick embryo, chicken egg, duck egg, calf (bovine) serum,
26 betapropiolactone, fetal bovine serum, formaldehyde (embalming fluid),
27 formalin, gelatin, glycerol, human diploid cells (originating from human aborted
28 fetal tissue), hydrolized gelatin, mercury thimerosal (thimerosal, Merthiolate(r)),

1 monosodium glutamate (MSG), neomycin, neomycin sulfate, phenol red
2 indicator, phenoxyethanol (antifreeze).

3 Data on phenoxyethanol (antifreeze) can be seen here at the National Center for
4 Biotechnology Information. PubChem Compound Database; *CID=31236*,
5 <https://pubchem.ncbi.nlm.nih.gov/compound/31236> (accessed Apr. 7, 2016).
6

7 ALTERNATIVE and IN VITRO TESTS/ in vaccines/biologics, preservatives are
8 used to prevent microbial growth. The present study examined: (1) the
9 comparative toxicities of commonly used preservatives in US licensed vaccines
10 to human neurons; and (2) the relative toxicity index of these compounds to
11 human neurons in comparison to bacterial cells. Using human neuroblastoma
12 cells, the relative cytotoxicity of the levels of the compounds commonly used as
13 preservative in US licensed vaccines was found to be phenol < 2-
14 phenoxyethanol < benzethonium chloride < Thimerosal. The observed relative
15 toxicity indices (human neuroblastoma cells/bacterial cells) were 2-
16 phenoxyethanol (4.6-fold) < phenol (12.2-fold) < Thimerosal (>330-fold). In
17 addition, for the compounds tested, except for 2-phenoxyethanol, the
18 concentrations necessary to induce significant killing of bacterial cells were
19 significantly higher than those routinely present in US licensed
20 vaccine/biological preparations.

21 None of the compounds commonly used as preservatives in US licensed
22 vaccine/biological preparations can be considered an ideal preservative, and their
23 ability to fully comply with the requirements of the US Code of Federal
24 Regulations (CFR) for preservatives is in doubt. Future formulations of US
25 licensed vaccines/biologics should be produced in aseptic manufacturing plants
26 as single dose preparations, eliminating the need for preservatives and an
27 unnecessary risk to patients. Abstract: PubMed.
28

1 It is also listed as a hazardous substance under: U.S. Clean Air Act (CAA), U.S.
2 Department of Transportation (DOT) and the U.S. National Toxicology Program
3 (NTP) 11th Report Part A “Known to be Human Carcinogens”.

4 **Aluminum hydroxide & aluminum phosphate:**

5 Aluminum is put into vaccines as an adjuvant purportedly to help them “work
6 better” or to “enhance” them. It begs the question, to help them do what better
7 exactly? Maim and kill people? Aluminum is present in food, air, water, and soil
8 and is said to be harmless when swallowed because the body doesn’t absorb it
9 well. But aluminum put directly into the blood stream is another matter. - See
10 more at: [http://www.westonaprice.org/health-topics/vaccination/adjuvants-in-](http://www.westonaprice.org/health-topics/vaccination/adjuvants-in-vaccines/#sthash.nXgSL1wj.dpuf)
11 [vaccines/#sthash.nXgSL1wj.dpuf](http://www.westonaprice.org/health-topics/vaccination/adjuvants-in-vaccines/#sthash.nXgSL1wj.dpuf).

12 According to the FDA, Aluminum may reach toxic levels with prolonged
13 parenteral feeding . . . Research indicates that patients with impaired kidney
14 function, including premature neonates [babies], who received parenteral levels
15 of aluminum at greater than 4 to 5 micrograms per kilogram of body weight per
16 day, accumulate aluminum at levels associated with central nervous system and
17 bone toxicity. Tissue loading may occur at even lower rates of administration.”

18 Also, according to government documents, “Aluminum content in parenteral
19 drug products could result in a toxic accumulation of aluminum in individuals
20 receiving TPN therapy. Research indicates that neonates and patient populations
21 with impaired kidney function may be at high risk of exposure to unsafe amounts
22 of aluminum. Studies show that aluminum may accumulate in the bone, urine,
23 and plasma of infants receiving TPN. Many drug products used in parenteral
24 therapy may contain levels of aluminum sufficiently high to cause clinical
25 manifestations . . . parenteral aluminum bypasses the protective mechanism of the
26 GI tract and aluminum circulates and is deposited in human tissues. Aluminum
27 toxicity is difficult to identify in infants because few reliable techniques are
28 available to evaluate bone metabolism in . . . infants . . . Although aluminum

1 toxicity is not commonly detected clinically, it can be serious in selected patient
2 populations, such as neonates, and may be more common than is recognized.
3 From these documents we learn that if a premature baby receives more than 10
4 mcg per day of aluminum in an IV, it can accumulate in their bones and brain,
5 and can be toxic.

6 The FDA's maximum requirements for aluminum received in an IV is 25
7 mcg per day. The suggested aluminum per kilogram of weight to give to a person
8 is up to 5 mcg. Thus, a baby weighing five pounds should get no more than 11
9 mcg of aluminum.

10 Anything that has more than 25 mcg of aluminum per dose requires a label
11 that says: "WARNING: This product contains aluminum that may be toxic.
12 Aluminum may reach toxic levels with prolonged parenteral administration if
13 kidney function is impaired. Premature neonates are particularly at risk because
14 their kidneys are immature, and they require large amounts of calcium and
15 phosphate solutions, which contain aluminum."

16 There is no requirement for vaccines to carry this label and also no
17 requirement to limit the maximum dosage to 25 mcg. All vaccines exceed the
18 maximum allowable aluminum per day for babies, toddlers and children. At birth,
19 most children are given the hepatitis B vaccination. The amount of aluminum in
20 the hepatitis B vaccine alone is almost fourteen times the amount of aluminum
21 that is FDA-approved for an eight-pound baby.

22 At well-baby check-ups, it's common for two-month, four-month, and six-
23 month appointments to include up to eight vaccinations, which add up to more
24 than 1,000 mcg of aluminum. This amount isn't even safe for a 350-pound adult.
25 And many children get up to eight vaccinations per visit several times a year. By
26 eighteen months, fully vaccinated babies have received almost 5000 mcg (5
27 milligrams) of highly neurotoxic aluminum into the bloodstream.
28

1 The counter argument is that in parenteral feeding, all the aluminum goes
2 instantaneously into the circulation, while in vaccines only a portion goes into the
3 circulatory system. Still, it is reasonable to question the safety of aluminum doses
4 that are many times higher than those considered safe for parenteral feeding.

5 According to the FDA and the AAP (American Academy of Pediatrics), at
6 more than the maximum required dose, aluminum builds up in the bones and
7 brain and can be toxic. Aluminum can cause neurological harm, including
8 cognitive impairment in healthy adults. Aluminum overdose can be fatal in
9 patients with weak kidneys or kidney disorders or in premature babies. Could this
10 be why the hepatitis B shot, given to infants at birth, has been linked to sudden
11 infant death syndrome (SIDS)?

12 **Formaldehyde (embalming fluid):**

13 Formaldehyde is toxic and is known to cause cancer. The International Agency
14 for Research on Cancer (IARC) classifies formaldehyde as a human carcinogen.
15 In 2011, the National Toxicology Program, an interagency program of the
16 Department of Health and Human Services, named formaldehyde as a known
17 human carcinogen. In addition, 10-20 percent of the general population may be
18 susceptible to formaldehyde allergies and may react acutely at any exposure
19 level. Formaldehyde is oxidized to formic acid which leads to acidosis and nerve
20 damage. Acidosis can be described as a condition in which the acidity of the
21 body tissues and fluids is abnormally high. The liver and the kidneys may also be
22 damaged.

23 **OSHA has warnings of exposure to humans to formaldehyde.**

24 Ingestion: Ingestion of as little as 30 ml of a 37 percent solution of formaldehyde
25 (formalin) can result in death. Gastrointestinal toxicity after ingestion is most
26 severe in the stomach and results in symptoms which can include nausea,
27 vomiting, and severe abdominal pain. Diverse damage to other organ systems
28 including the liver, kidney, spleen, pancreas, brain, and central nervous systems

1 can occur from the acute response to ingestion of formaldehyde. Long term
2 exposure to formaldehyde has been shown to be associated with an increased risk
3 of cancer of the nose and accessory sinuses, nasopharyngeal and oropharyngeal
4 cancer, and lung cancer in humans. Animal experiments provide conclusive
5 evidence of a causal relationship between nasal cancer in rats and formaldehyde
6 exposure. Concordant evidence of carcinogenicity includes DNA binding,
7 genotoxicity in short-term tests, and cytotoxic changes in the cells of the target
8 organ suggesting both preneoplastic changes and a dose-rate effect.
9 Formaldehyde is a complete carcinogen and appears to exert an effect on at least
10 two stages of the carcinogenic process.

11 The California Department of Public Health as stated that “Overexposure
12 to Formaldehyde irritates the eyes, nose, throat, and skin. Formaldehyde can
13 cause allergic reactions of the skin (dermatitis) and the lungs (asthma).

14 Formaldehyde is a known cause of cancer in humans.” Reference:

15 https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=8&cad=rja&uact=8&ved=0ahUKEwjQpKyvrf3LAhVFsYMKHUV2DvsQFghPMAc&url=https%3A%2F%2Fwww.cdph.ca.gov%2Fprograms%2Fthesis%2FDocuments%2Fformaldehyde.pdf&usg=AFQjCNE7Gk0Ej_LzQolPfZg6CLnSALRVsg&sig2=ajmlghfcTjgQt9ZN3SXp0A.

21 **Mercury Thimerosal**

22 Thimerosal is a preservative containing approximately 50 percent mercury.
23 Mercury is the second most poisonous element known to man (next to uranium
24 and its derivatives). When someone says, “Mercury!” we immediately think of
25 the news stories about the child at school who broke a thermometer in biology
26 class and the hazmat team was called in. All the students were in peril. Hazmat
27 teams are called in for less mercury than the amount contained in one vaccine.
28

1 Thimerosal prevents bacteria growth in multi-use vaccines. It was removed from
2 many vaccines in 2004—at which time more vaccines containing aluminum were
3 added to the schedule, while mercury-laden flu vaccines were then recommended
4 for infants, and two years later for pregnant women, Mercury is also used in the
5 vaccine creation process and then through a purification procedure it is
6 purportedly “removed”. However, in some vaccines, “trace” amounts are still
7 left.

8 - See more at: [http://www.westonaprice.org/health-topics/vaccination/adjuvants-](http://www.westonaprice.org/health-topics/vaccination/adjuvants-in-vaccines/#sthash.nXgSL1wj.dpuf)
9 [in-vaccines/#sthash.nXgSL1wj.dpuf](http://www.westonaprice.org/health-topics/vaccination/adjuvants-in-vaccines/#sthash.nXgSL1wj.dpuf).

10 There are mounds of other data surrounding the side-affects and toxicity
11 for these and the other above mentioned ingredients that could be compiled and
12 listed here, but for the sake of brevity, that information will not be presented
13 here. That information is well known to the public and the Defendants.

14 “A single vaccine given to a six-pound newborn is the equivalent of giving a 180-
15 pound adult 30 vaccinations on the same day.” Dr. Boyd Haley, Professor and
16 Chair, Dept. of Chemistry, University of Kentucky (2001).

17 "If children receive all recommended vaccines, they will receive 2,370
18 times the "allowable safe limit" for mercury in the first two years of life (as if
19 there is such a thing as a "safe" amount of a toxic poison). Yet, even after
20 Congressional hearings instigated by Congressman Dan Burton (whose own
21 grandchild became autistic after receiving vaccines) resulted in the FDA
22 requesting (not ordering) vaccine manufacturers to remove this toxic heavy metal
23 from their products, mercury is still present in many vaccines." Rebecca Carley,
24 M.D.

25 "No batch of vaccine can be proved safe before it is given to children." Surgeon
26 General of the United States Leonard Scheele, addressing an AMA convention in
27 1955.

1 "The only safe vaccine is a vaccine that is never used" Dr. James A. Shannon,
2 National Institutes of Health.

3 "There is a great deal of evidence to prove that immunization of children does
4 more harm than good." Dr. J. Anthony Morris, formerly Chief Vaccine Control
5 Officer at the FDA.

6 Immunizations, as is forced upon all Americans as a "one size fits all" mandate is
7 a national scam. There is such a thing as "natural" immunity, based on good
8 food, good hygiene, indoor plumbing, excellent nutrition and breast feeding of
9 infants. There is no conclusive evidence that vaccines have ever cured diseases
10 or saved the lives of Americans or protected the health of children in America.
11 The change in Americans' general health was due mostly to the implementation
12 of indoor plumbing, clean water, better hygiene, better nutrition, better foods, etc.
13 With the implementation of SB277, the Defendants have stripped away the
14 ability of parents to invoke their natural rights of self-preservation and or to opt
15 out of this criminal assault on their children's lives by being coerced, intimidated,
16 and forced into compliance under this dark cloud of medical and political
17 tyranny.

18 Plaintiffs, like thousands of others, have been deprived of their, liberty,
19 labor and certain inalienable rights protected by the United States Constitution by
20 the egregious actions of the Defendants. The Defendants' actions have misused
21 the laws of California and the united States of America for their own special
22 interests.

23 Further, Plaintiffs are victims of extortion and oppression perpetrated by
24 the Defendants, and each of them, who have consistently and deliberately
25 attempted to overthrow the California and United States Constitutions in
26 violation of their oaths of office, which violates California and United States law
27 including the U.S. Constitution's Bill of Rights.

1 The Defendants are using Child Protective Services, local law,
2 enforcement agencies, public health agencies and the various California
3 Superintendent of Schools as their affiliates to intimidate, incarcerate and coerce
4 the people of California to comply with this unlawful, tyrannical bill. The
5 Defendants have unlawfully used the California legislative process in furtherance
6 of their objective to subject Californians to chemical and biological warfare for
7 their own financial gain and profit. This "R.I.C.O." law suit documents a
8 continuous pattern of violations of federally protected rights perpetrated against
9 Plaintiffs and other California residents by Defendants and their known and
10 unknown affiliates.

11 Defendants have engaged in a common enterprise, and common course of
12 conduct, the purpose of which is and was to engage in the violations of law
13 alleged in this Complaint. This common enterprise and common course of
14 conduct continues to the present.

15 This lawsuit further attempts to report and provide evidence that the
16 Defendants are operating the California Legislature like a *criminal enterprise*
17 outside the confines of California and United States Law. The patterns of wrongs
18 that are documented in this lawsuit have inflicted great harm upon Plaintiffs, the
19 citizens of California, the United States and upon the rule of law.

20 Plaintiffs through this lawsuit seek damages and relief from these
21 violations of numerous state and federally protected rights. Plaintiffs seek
22 restitution imposing Civil Penalties, and granting all other relief provided for
23 under California and United States Law against all named Defendants, jointly and
24 severally for engaging in their unlawful and corrupt political practices.

JURISDICTION

1. This action arises under the provisions of the Racketeering Influenced and Corrupt Organizations Act, Title 18 U.S.C. §§ 1961- 1964.
2. 18 U.S.C. § 1964(a) and (c)(a). The district courts of the United States shall have jurisdiction to prevent and restrain violations of section 1962 of this chapter by issuing orders including, but not limited to: ordering any person to divest himself of any interest, direct or indirect, in any enterprise imposing reasonable restrictions on the future activities or investments of any person including, but not limited to, prohibiting any person from engaging in the same type of endeavor as the enterprise engaged in, the activities of which affect interstate or foreign commerce or ordering dissolution or reorganization of any enterprise, making due provisions for the rights of innocent persons.

(C) Any person injured in his business or property by reason of a violation of section 1962 of this chapter may sue therefore in any appropriate United States district court and shall recover threefold the damages he sustains and the cost of the suit, including reasonable attorney’s fees.
3. 28 U.S.C. §§ 1343 and the First Amendment to the United States Constitution which provides for a *federal court forum* in which citizens may seek regress from the deprivation of rights, privileges, and immunities under color of state law.
4. 28 U.S.C. § 1331, the general federal question statute. 28 U.S.C. § 2201 and § 2202, the federal declaratory relief and injunctive relief statutes, to declare the rights of the parties.
5. 28 U.S.C. § 1332 (a)(1), diversity of jurisdiction of citizens of different states and the amount of controversy exceeds \$75,000.00.

1 6. This Court may exercise supplemental jurisdiction pursuant to 28 U.S.C. §
2 1367(a) over Plaintiffs' state law claims for violations of The California
3 Constitution Article 1 § 1 that guarantees all people the right to life, liberty,
4 pursuing and obtaining safety, happiness, and privacy. And Article 1 § 4 of
5 the California Constitution, which provides that The Legislature shall make
6 no law respecting an establishment of religion, as these claims are so related
7 to the Plaintiffs' claims in the action within the original federal question
8 jurisdiction that it forms part of the same case or controversy under Article
9 III of the United States Constitution.

10 7. The Constitution for the United States of America, all of the above statutes but
11 not limited thereto.

12 8. This Incorporated Case is filed under the American Free Flag of peace of the
13 united states of America and UCC 1-103.6. No jurisdiction under any
14 American flags of war will be accepted in this Case Incorporation.

15
16 **VENUE**

17 9. Venue of this Court is proper pursuant to Title 28 U.S.C. § 1391(a)(2), (b)(2),
18 because the subject conduct of the defendants is based upon the wrongful acts
19 and harm inflicted against the Plaintiffs by all Defendants complained of
20 herein while Defendants where acting as Agents or Assigns of the People of,
21 and or the State of California.

22
23 **PARTIES**

24 **Plaintiffs**

25 10. Plaintiff Travis Middleton, Private Attorney General ex rel, is a private
26 citizen residing in the State of California at 27 West Anapamu Street No. 153
27 Santa Barbara, California 93101, and appears on behalf of *others similarly*
28 *situated* throughout the California area.

- 1 11. Plaintiff Eric Durak is a private citizen residing in the State of California at
2 133 Campo Vista Drive Santa Barbara, California 93111.
- 3 12. Plaintiff Jade Baxter is a private citizen residing in the State of California at
4 207 West Victoria Street Santa Barbara, California 93101.
- 5 13. Plaintiff Julianna Pearce is a private citizen residing in the State of
6 California at 28780 My Way, Oneals, California 93645.
- 7 14. Plaintiff Candyce Estaves is a private citizen with a vaccine injured
8 Son and daughter residing in the State of California at 430 East Rose
9 Avenue Santa Maria California 93454.
- 10 15. Plaintiff Denise Michelle Derusha is a private citizen residing in the State of
11 California at 291 South Oakglen Avenue Nipomo, California 93444.
- 12 16. Plaintiff Melissa Christou is a private citizen residing in the State of
13 California at 1522 knoll Circle Drive Santa Barbara, California 93101.
- 14 17. Plaintiff Andrea Lewis is a private citizen residing in the State of California
15 at 1331 Santa Barbara St. # 10, Santa Barbra, California 93101.
- 16 18. Plaintiff Rachil Vincent is a private citizen residing in the State of California
17 at 4320 Viua Presada, Santa Barbara, California 93110.
- 18 19. Plaintiff Jackie Kozak is a private citizen residing in the State of California at
19 1573 Lyndhivist Ave Camarillo, California 93010.
- 20 20. Plaintiff Don Demanlevesde is a private citizen residing in the State of
21 California at 618 West Ortega Santa Barbara, California 93111.
- 22 21. Plaintiff Jessica Haas is a private citizen residing in the State of California at
23 2715 Verde Vista Santa Barbara, California 93105.
- 24 22. Plaintiff Paige Murphy is a private citizen residing in the State of California
25 at 2230 Memory Lane West Lake Village, California 91361.
- 26 23. Plaintiff Christie Macias is a private citizen residing in the State of California
27 at 618 West Ortega Santa Barbara, California 93101.
- 28 24. Plaintiff Lori Strantz is a private citizen residing in the State of California at

1 120 Barranca #B Santa Barbara, California 93109.

2 25. Plaintiff Anwanur Gielow is a private citizen residing in the State of
3 California at 390 Park Street Buelton, California 93427.

4 26. Plaintiff Lisa Ostendorf is a private citizen residing in the State of California
5 at 5459 Place Court, Santa Barbara, California 93111.

6 27. Plaintiff Julia Anne Whitney is a private citizen residing in the State of
7 California at 55 Crestview Lane Montecito, California 93108.

8 30. Plaintiff Pam Corner is a private citizen residing in the State of California at
9 613 West Micheltorena Street, Santa Barbara, California 93101.

10 31. Plaintiff Jodie Trsserand is a private citizen residing in the State of
11 California at 7697 Willow Glen Rd. Los Angeles, California 90046.

12 32. Plaintiff Alice Tropper is a private citizen residing in the State of California
13 at 1805 Mountain Avenue Santa Barbara, California 93101.

14 33. Plaintiff Bret Nielsen is a private citizen residing in the State of California at
15 2230 Memory Lane West Lake Village, California 91361.

16 34. Plaintiff Brent Haas is a private citizen residing in the State of California at
17 2715 Verde Vista Santa Barbara, California 93105.

18 35. Plaintiff Murid Rosensweet is a private citizen residing in the State of
19 California at 2230 Memory Lane West Lake Village, California 91361.

20 36. Plaintiff Andy Taft is a private citizen residing in the State of California at
21 1482 Menora Street Carpinteria, California 93103.

22 37. Plaintiff Marina Read is a private citizen residing in the State of California
23 at 322 Pebble Beach Drive Goleta, California 93117.

24
25 **Defendants**

26 **38.** Defendant Richard Pan, herein after (“Defendant Pan”) is and was at all times
27 material in this complaint a California legislator within the State of California with
28 a business address of the State Capitol, Room 4070 Sacramento, CA 95814.

1
2 **39.** Defendant Win-Li Wang, herein after (“Defendant Wang”) is and was at all
3 times material in this complaint, the wife of Defendant Richard Pan, a private
4 citizen doing business in the State of California with a business address of 4136 E.
5 Commerce Way, Suite 100, Sacramento, California 95834.
6

7 **40.** Defendant Martin Jeffrey “Marty” Block, herein after (“Defendant Marty
8 Block”) is and was at all times material in this complaint a California legislator
9 within the State of California with a business address of the State Capitol, Room
10 4072 Sacramento, CA 95814.
11

12 **41.** Defendant Cindy Block, herein after (“Defendant Cindy Block”) is and was at
13 all times material in this complaint the wife of Defendant Martin “Marty” Block, a
14 private citizen with a business address of the State Capitol, Room 4072
15 Sacramento, CA 95814.
16

17 **42.** Defendant Gerald A. “Jerry” Hill, herein after (“Defendant G. Hill”) is and was
18 at all times material in this complaint a California legislator within the State of
19 California with a business address of the State Capitol, Room 5035 Sacramento,
20 California 95814-4900.
21

22 **43.** Defendant Sky Hill, herein after (“Defendant Sky Hill”) is and was at all times
23 material in this complaint the wife of Defendant Gerald Hill, a private citizen with
24 a business address of the State Capitol, Room 5035 Sacramento, California 95814-
25 4900.
26

27 **44.** Defendant Holly Mitchell, herein after (“Defendant Mitchell”) is and was at all
28 times material in this complaint a California legislator within the State of

1 California with a business address of the State Capitol, Room 5080, Sacramento,
2 California 95814.

3
4 **45.** Defendant Catharine Baker, herein after (“Defendant Baker”) is and was at all
5 times material in this complaint a California legislator within the State of
6 California with a business address of the Capitol Office, the State Capitol
7 Sacramento, California 94249.

8
9 **46.** Defendant Dan Baker, herein after (“Defendant Dan Baker”), is and was at all
10 times material in this complaint the spouse of Defendant Catharine Baker and a
11 private citizen with a business address of the Capitol Office, the State Capitol
12 Sacramento, California 94249.

13
14 **47.** Defendant Christina Garcia, herein after (“Defendant Garcia”), is and was at all
15 times material in this complaint a California legislator within the State of
16 California with a business address of the State Capitol P.O. Box 942849
17 Sacramento, California 94249-005858.

18
19 **48.** Defendant Adrin Nazarian, herein after (“Defendant Nazarian”), is and was at
20 all times material in this complaint a California legislator within the State of
21 California with a business address of the State Capitol Post Office Box 942849
22 Sacramento, California 94249-0046.

23
24 **49.** Defendant Diana Nazarian, herein after (“Defendant Diana Nazarian”), is and
25 was at all times material in this complaint the wife of Defendant Adrin Nazarian
26 and a private citizen with a business address of the State Capitol Post Office Box
27 942849 Sacramento, California 94249-0046.

1 **50.** Defendant Jim Wood, herein after (“Defendant Wood”), is and was at all times
2 material in this complaint a California legislator within the State of California with
3 a business address of the State Capitol P.O. Box 942849, Room 6005 Sacramento,
4 California 94249-0002.

5
6 **51.** Defendant Jane Wood, herein after (“Defendant Jane Wood”), is and was at all
7 times material in this complaint the wife of Defendant Jim Wood and a private
8 citizen with a business address of the State Capitol P.O. Box 942849, Room 6005
9 Sacramento, California 94249-0002.

10
11 **52.** Defendant Ben Allen, herein after (“Defendant Allen”), is and was at all times
12 material in this complaint a California legislator within the State of California with
13 a business address of the State Capitol, Room 2054 Sacramento, California 95814.

14
15 **53.** Defendant Kevin de Leon, herein after (“Defendant de Leon”), is and was at all
16 times material in this complaint a California legislator within the State of
17 California with a business address of the State Capitol, Room 205 Sacramento,
18 California 95814.

19
20 **54.** Defendant Hannah-Beth Jackson, herein after (“Defendant Jackson”), is and
21 was at all times material in this complaint a California legislator within the State of
22 California with a business address of the State Capitol, Room 2032 Sacramento,
23 California 95814.

24
25 **55.** Defendant George Eskin, herein after (“Defendant Eskin”), is and was at all
26 times material in this complaint the spouse of Defendant Hannah-Beth Jackson
27 with a business address of the State Capitol, Room 2032 Sacramento, California
28 95814.

1 **56.** Defendant Jeff Stone, herein after (“Defendant Stone”), is and was at all times
2 material in this complaint a California legislator within the State of California with
3 a business address of the State Capitol, Room 4062 Sacramento, California 95814.
4

5 **57.** Defendant Richard Bloom, herein after (“Defendant Bloom”), is and was at all
6 times material in this complaint a California legislator within the State of
7 California with a business address of Room 2003, State Capitol 1303 Tenth Street
8 Sacramento, California 9581468.
9

10 **58.** Defendant Robbie Black, herein after (“Defendant Black”), is and was at all
11 times material in this complaint the wife of Defendant Richard Bloom with a
12 business address of Room 2003, State Capitol 1303 Tenth Street
13 Sacramento, California 9581468.
14

15 **59.** Defendant Bill Quirk, herein after (“Defendant Quirk”), is and was at all times
16 material in this complaint a California legislator within the State of California with
17 a business address of the State Capitol P.O. Box 942849 Sacramento, California
18 94249-0020.
19

20 **60.** Defendant Laurel Quirk, herein after (“Defendant Laurel Quirk”), is and was at
21 all times material in this complaint the wife of Defendant Bill Quirk with a
22 business address of the State Capitol P.O. Box 942849 Sacramento, California
23 94249-0020.
24

25 **61.** Defendant Lorena Gonzales, herein after (“Defendant Gonzales”), is and was at
26 all times material in this complaint a California legislator within the State of
27 California with a business address of the State Capitol P.O. Box 942849
28 Sacramento, California 94249-0080.

1
2 **62.** Defendant Reginald Jones-Sawyer, herein after (“Defendant Sawyer”), is and
3 was at all times material in this complaint a California legislator within the State of
4 California with a business address of the State Capitol P.O. Box 942849
5 Sacramento, California 94249-0059.
6

7 **63.** Defendant Isadore Hall, herein after (“Defendant Hall”), is and was at all times
8 material in this complaint a California Legislator within the State of California
9 with a business address of the State Capitol, Room 4085 Sacramento, California
10 95814.
11

12 **64.** Defendant Mark Leno, herein after (“Defendant Leno”), is and was at all times
13 material in this complaint a California Legislator within the State of California
14 with a business address of the State Capitol, Room 5100 Sacramento, California
15 95814-4900.
16

17 **65.** Defendant Douglas Jackson, herein after (“Defendant Jackson”), is and was at
18 all times material in this complaint the spouse or life partner of Defendant Leno
19 with a business address of the State Capitol, Room 5100 Sacramento, California
20 95814-4900.
21

22 **66.** Defendant Bob Wieckowski, herein after (“Defendant Wieckowski”), is and
23 was at all times material in this complaint a California Legislator within the State
24 of California with a business address of the State Capitol, Room 3086 Sacramento,
25 California 95814.
26
27
28

1 **67.** Defendant Sue Lemke, herein after (“Defendant Lemke”), is as was at all times
2 material in this complaint the spouse of Defendant Wieckowski with a business
3 address of the State Capitol, Room 3086 Sacramento, California 95814.
4

5 **68.** Defendant David Chiu, herein after (“Defendant Chiu”), is and was at all times
6 material in this complaint a California Legislator within the State of California
7 with a business address of 2196 Legislative Office Building Sacramento,
8 California 94249-0017.
9

10 **69.** Defendant Candace Chen, herein after (“Defendant Chen”), is and was at all
11 times material in this complaint the spouse of Defendant David Chiu with a
12 business address of 433 California Street, Suite 815 San Francisco, California
13 94104.
14

15 **70.** Defendant Evan Low, herein after (“Defendant Low”), is and was at all times
16 material in this complaint a California Legislator within the State of California
17 with a business address of the state capitol Room 2175 Sacramento, California
18 94249-0028.
19

20 **71.** Defendant Anthony Rendon, herein after (“Defendant Rendon”), is as was at
21 all times material in this complaint a California Legislator within the State of
22 California with a business address of Room 219 State Capitol 1303 Tenth Street
23 Sacramento, California 95814.
24

25 **72.** Defendant Annie Lam herein after (“Defendant Lam”), is and was at all times
26 material in this complaint the spouse of Defendant Rendon with a business address
27 of Room 219 State Capitol 1303 Tenth Street
28 Sacramento, California 95814.

1 **73.** Defendant Jim Beall, herein after (“Defendant Beall”), is as was at all times
2 material in this complaint a California Legislator within the State of California
3 with a business address of the State Capitol, Room 5066 Sacramento, California
4 95814.

5
6 **74.** Defendant Pat Lafkas, herein after (“Defendant Lafkas”), is and was at all
7 times material in this complaint the spouse of Defendant Beall with a business
8 address of the State Capitol, Room 5066 Sacramento, California 95814.

9
10 **75.** Defendant Robert Hertzberg, herein after (“Defendant Hertzberg”), is as was at
11 all times material in this complaint a California Legislator within the State of
12 California with a business address of the State Capitol, Room 4038 Sacramento,
13 California 95814.

14
15 **76.** Defendant Mike McGuire, herein after (“Defendant McGuire”), is as was at all
16 times material in this complaint a California Legislator within the State of
17 California with a business address of the State Capitol 1303 10th Street, Room
18 5064 Sacramento, California 95814.

19
20 **77.** Defendant Erika McGuire, herein after (“Defendant Erika McGuire”), is as was
21 at all times material in this complaint the spouse of Defendant Mike McGuire with
22 a business address of the State Capitol 1303 10th Street, Room 5064 Sacramento,
23 California 95814.

24
25 **78.** Defendant Lois Wolk, herein after (“Defendant Lois Wolk”), is and was at all
26 times material in this complaint a California Legislator within the State of
27 California with a business address of the State Capitol, Room 5114 Sacramento,
28 California 95814.

1 **79.** Defendant Bruce Wolk, herein after (“Defendant Bruce Wolk”), is and was at
2 all times material in this complaint the spouse of Defendant Lois Walk with a
3 business address of the U.C. Davis Law School, 1 Shields Ave, Davis, California
4 95616.

5
6 **80.** Defendant Jim Cooper, herein after (“Defendant Cooper”), is and was at all
7 times material in this complaint a California Legislator within the State of
8 California with a business address of the State Capitol Post Office Box 942849
9 Room 5158 Sacramento, California 95814.

10
11 **81.** Defendant Kristen Cooper, herein after (“Defendant Kristen Cooper”), is as
12 was at all times material in this complaint the spouse of Defendant Jim Cooper
13 with a business address of the State Capitol Post Office Box 942849 Room 5158
14 Sacramento, California 95814.

15
16 **82.** Defendant Kevin McCarthy, herein after (“Defendant McCarthy”), is and was
17 at all times material in this complaint a California Legislator within the State of
18 California with a business address of 4100 Empire Drive Suite 150 Bakersfield,
19 California 93309.

20
21 **83.** Defendant Judy McCarthy, herein after (“Defendant Judy McCarthy”), is and
22 was at all times material in this complaint the spouse of Defendant Kevin
23 McCarthy with a business address of 4100 Empire Drive Suite 150 Bakersfield,
24 California 93309.

25
26 **84.** Defendant Mark Stone, herein after (“Defendant Mark Stone”), is and was at
27 all times material in this complaint a California Legislator within the State of
28

1 California with a business address of the State Capitol, Room 5155, 1303 Tenth
2 Street Sacramento, California 95814 95.

3
4 **85.** Defendant Kathy Stone, herein after (“Defendant Kathy Stone”), is and was at
5 all times material in this complaint the spouse of Defendant Mark Stone with a
6 business address of the State Capitol, Room 5155, 1303 Tenth Street Sacramento,
7 California 95814 95.

8
9 **86.** Defendant Edmund Gerald “Jerry” Brown, Jr., herein after (“Defendant
10 Brown”) is and was at all times mentioned in this complaint the governor of the
11 State of California with a business address of the State Capitol, suite 1173
12 Sacramento, California 95814.

13
14 **87.** Defendant Anne Gust, herein after (“Defendant Gust”) is and was at all times
15 mentioned in this complaint the wife of Defendant Jerry Brown with a business
16 address of the State Capitol, suite 1173 Sacramento, California 95814.

17
18 **88.** Defendant the STATE OF CALIFORNIA, herein after (“Defendant
19 CALIFORNIA”) is and was at all times mentioned in this complaint a corporate
20 fiction with a business address of 1300 “I” Street Sacramento, California 95814-
21 2919.

22 **89.** Plaintiffs are informed and believe, and based thereon allege, that at all times
23 relevant herein, each Defendant, regardless of how named was designated, the
24 Agent, Assign, Servant, and/or Employee of each and every other Defendant, and
25 at all times relevant herein was acting within the purpose, scope, and course of said
26 Agency, Assignment, Service and Employment, with the express and/or implied
27 knowledge, permission, and consent of the remaining Defendants, and each of the
28 said Defendants ratified and approved the acts of each such Defendants.

1 **90.** The Plaintiffs are informed and believe, and on that basis allege, that the
2 Defendants, and each of them, were, at all relevant times acting within the purpose
3 and scope of said agency and employment, and that each Defendant has ratified
4 and approved the acts of its agents. The allegations of the Complaint stated on
5 information and belief are likely to have Evidentiary Support, after a reasonable
6 opportunity for further Investigation and Discovery.

7
8 **FACTS APPLICABLE TO ALL CLAIMS FOR RELIEF**

9
10 **91.** *“In around December 2014, it was reported that at least 40 visitors of*
11 *Disneyland contracted measles at the park between December 17–20, 2014,*
12 *triggering an outbreak, especially due to the presence of intentionally*
13 *unvaccinated individuals. The likely “patient zero” was speculated to be an*
international visitor to the park”. Source, *WikiPedia.com*.

14 **92.** This is the so-called reason that spawned the vaccine bill SB277 authored by
15 Defendants Richard Pan, Ben Allen and Lorena Gonzales.

16
17 Quoting the L.A. Times: *“Although epidemiologists have not yet identified the*
18 *person who brought measles to Disneyland, a new analysis shows that the highly*
19 *contagious disease has spread to seven states and two other countries thanks to*
parents who declined to vaccinate their children”.

20
21 **93.** This statement is a total fabrication. Given the fact that the health officials
22 have yet to properly identify the infected person who purportedly visited
23 Disneyland, there is no way of determining how, where or who these alleged
24 recipients contracted the measles from in the first place. Additionally, if the health
25 officials have failed to identify the person who started the original infection, then it
26 would be next to impossible to determine not only where this infamous person has
27 been, where they’ve since traveled and how many others may or may not have
28 come into contact with him or her. In any event, the infected people were identified

1 and properly quarantined and treated. This seems hardly a need for a mandatory
2 vaccine bill for all Californians.

3
4 **94.** If the other news sources are correct in that this person was from another
5 country, how and why does this fact even remotely suggest that American parents
6 who chose not to vaccinate “their” children (which according to California Health
7 officials make up only 2.5% of the populace), are somehow responsible for this so-
8 called outbreak? Such a claim is dubious at best. There is no plausible scientific or
9 other kind of evidence to support this nonsensical view. According to the CDC,
10 *“Measles can be prevented with the MMR (measles, mumps, and rubella) vaccine.
11 One dose of MMR vaccine is about 93% effective at preventing measles if exposed
12 to the virus, and two doses are about 97% effective. In the United States,
13 widespread use of measles vaccine has led to a greater than 99% reduction in
14 measles cases compared with the pre-vaccine era. Since 2000, when measles was
15 declared eliminated from the U.S., the annual number of people reported to have
16 measles ranged from a low of 37 people in 2004 to a high of 668 people in 2014.
17 Most of these originated outside the country or were linked to a case that
18 originated outside the country”.*

19
20
21
22 **95.** If the statistics from the CDC are true that the measles vaccine is 93% to 97%
23 effective in preventing measles, and the measles have already been declared
24 eliminated in the United States since 2000, then even if 37 people in 2004 and 668
25 people in 2014 came down with measles, these numbers are still extremely small
26 compared to the number of people living in the United States which is around 323
27 million, 394 thousand people. California has nearly 39 million people. Out of 39
28

1 million people, 30 to 40 infected people who got adequate medical care does not
2 constitute an outbreak. And, according to the CDC, if the MMR vaccine is 93% to
3 97% effective, then why and how did some of the vaccinated people who were
4 exposed acquire the measles? This narrative by the CDC officials is pure fiction.
5 Additionally, there is no evidence that unvaccinated children can infect people
6 with diseases that they do not have. And, if the measles have been determined to
7 have been eliminated from the U.S. which has estimated well over 323 million
8 people, then in light of these numbers the whole Disneyland event is just another
9 contradiction and falsehood.
10

11
12 **96.** Also, how is it possible for the officials to make a determination of the cause
13 and origin of the other purported seven states with infectious people? One could
14 argue that these events are not related at all to the Disneyland event.
15

16 *“Based on historical data, infectious disease experts know that in the absence of*
17 *any vaccination, a single person infected with measles can spread it to between 11*
18 *and 18 other people. They also know that it takes 10 to 14 days for one measles*
case to lead to another”. -L.A. Times.
19

20 **97.** If this statement is true, then there is at least a ten-day to two week period of
21 time that will pass before any person who comes into contact with anyone infected
22 with the measles will show any symptoms. The possibilities are endless as to how
23 many places and people a person may come into contact with once infected. There
24 is no way of certainty to determine where a person was infected and who infected
25 them. Since the daily attendance at Disneyland is somewhere between 40 to 50,000
26 people, why didn't more people get infected? This whole measles outbreak
27 narrative is simply beyond preposterous.
28

1 *“The index patient in the 3-month-old Disneyland outbreak was probably exposed*
2 *to the measles overseas and then visited the Anaheim amusement park while*
3 *contagious, according to the Centers for Disease Control and Prevention. This*
4 *particular strain of measles is identical to one that spread through the*
5 *Philippines last year, where it sickened about 58,000 people and killed 110.*
6 *No deaths have been traced to the Disneyland outbreak”.*
7 [http://www.latimes.com/science/sciencenow/la-sci-sn-disneyland-measles-under-](http://www.latimes.com/science/sciencenow/la-sci-sn-disneyland-measles-under-vaccination-20150316-story.html)
8 [vaccination-20150316-story.html](http://www.latimes.com/science/sciencenow/la-sci-sn-disneyland-measles-under-vaccination-20150316-story.html). But this was in the Philippines, not the U.S.

9 **98.** In reading the above quote from the L.A. Times article where it is purported
10 that:

11 *“the “3-month-old Disneyland outbreak was probably exposed to the measles*
12 *overseas and then visited the Anaheim amusement park while contagiousThis*
13 *particular strain of measles is identical to the one that spread through the*
14 *Philippines last year, where it sickened about 58,000 people and killed 110”.*

15 **99.** Again, since the Center for Disease Control has seemingly already admitted
16 that this strain of measles is identical to the one that spread throughout the
17 Philippines last year where it sickened about 58,000 people and killed 110, one
18 could conclude either that all of California’s parents who refuses to vaccinate their
19 children (or at least some of them-the 2.5 %) were in the Philippines at this same
20 time last year to become exposed to and contract this strain of measles and only a
21 few of these parents or kids showed up at Disneyland to infect others. But, if that
22 were the case these same Americans and their children would have already been
23 treated for the disease either while in the Philippines or shortly after they returned
24 to the States. This narrative suggests that the CDC is also accusing both the
25 unvaccinated children along with the unidentified person as the cause of the
26 Disneyland event both at the same time, thus making this narrative a fabrication
27 larger than Yosemite National Park.
28

1 **100.** It has been over a year since the outbreak in the Philippines, so to put the
2 blame on the parents who refuses to vaccinate their children is totally bogus and
3 without merit. Or, did this infamous “patient zero” cause this infectious event?
4 But, again this individual has yet to be identified so it is unlikely that the CDC can
5 point the finger at this “ghost” either. More likely than not, there is no “patient
6 zero”. This fictitious person is a creation of the Defendants to assist them in their
7 attempt to legitimize the Measles event at Disneyland and to further pass unlawful
8 and unconstitutional legislation known as SB277 and other bills like it.
9

10 **101.** In view of these severe discrepancies and falsehoods in the official reports of
11 this Disneyland measles event, one could conclude that the whole event is a hoax
12 on a grand scale and that the Defendants and their P.R. people should learn to lie
13 better.
14

15 **The Lies Corruption and Deceit Continues on The Floor of The Legislature**

16
17 **102.** The Sacramento Bee reports; “The bill heads to the Senate Judiciary
18 Committee, the next step in a potentially long odyssey winding through several
19 committees and floor votes in both the Assembly and Senate. Every Democrat on
20 the Judiciary Committee is either a co-sponsor of the bill or has voted for it.”
21 As the committee chair, Carol Liu, offered Senator Pan an extra week due to the
22 bill’s imminent demise, Defendant Pan was caught on camera receiving his orders
23 from lobbyists Jodi Hicks and Janus Norman. The senator has former working ties
24 to both. This is an extreme conflict of interest.
25

26 **103.** According to an article from 2014 in the Sacramento Bee:
27 “As a UC Davis pediatrician, Pan was an active member of the group that lobbies
28 for doctors in the Capitol, known as the California Medical Association. Jodi Hicks

1 was the association’s chief lobbyist. ... and is a partner in a Sacramento lobbying
 2 firm called DiMare, Brown, Hicks & Kessler. She routinely seeks Pan’s votes as
 3 she lobbies for clients that include associations representing family physicians, eye
 4 doctors and podiatrists. Those three groups have together given more than \$20,000
 5 to Pan’s campaign.”

7 **104.** Hicks daughter, Seneca, appeared in Defendant Pan’s campaign
 8 commercials. Hicks said about her daughter Seneca appearing in Defendant Pan’s
 9 campaign commercials, “I don’t think anyone other than a few of us here in
 10 Sacramento know it’s a lobbyist’s daughter.” Interestingly enough, Jodi Hicks now
 11 works for DiMare, Brown, Hicks & Kessler, LLC (DBHK) and was named Capitol
 12 Weekly’s “Top 100”, an annual ranking of the most powerful players in California
 13 politics. It is my opinion that Ms. Hicks is near the top of a dubious, stinking pile
 14 of corruption.

16 **105.** Defendants Pan, Allen and Gonzalez then colluded and conspired with Jodi
 17 Hicks and other lobbyist to encourage the other Defendant legislators through
 18 monetary compensation to join in, support and pass SB277.

21 **106. TOP DRUG MAKER DONORS**

23 State records show that pharmaceutical companies and trade groups donated more
 24 than \$2 million to current lawmakers in 2013-2014.

Pharmaceutical company or group	Campaign donations to current state legislators	Direct lobbying payments
Johnson & Johnson Inc.	\$86,300	\$583,926
GlaxoSmithKline	\$32,250	\$561,479

1	Eli Lilly & Company	\$193,100	\$280,863
2	Gilead Sciences Inc.	\$77,600	\$196,732
3	Biocom PAC	\$30,000	\$223,224
4	Sanofi	\$48,000	\$172,500
5	Abbott Laboratories	\$173,600	\$42,500
6	Astellas Pharma US Inc.	\$47,900	\$161,440
7	AstraZeneca Pharmaceuticals LLP	\$157,300	\$49,583
8	Merck & Co. Inc.	\$91,600	\$108,204
9	California Pharmacists Association	\$53,389	\$134,176
10	Pharmaceutical Research & Manufacturers Assn.	\$137,950	\$45,455
11	Eisai Inc.	\$92,000	\$88,000
12	Bristol-Myers Squibb Company	\$32,300	\$144,101
13	Pfizer	\$150,600	\$21,250
14	AbbVie	\$138,425	\$25,530
15	Amgen	\$105,600	\$45,455
16	Allergan USA Inc.	\$120,100	\$22,757
17	Takeda Pharmaceuticals USA Inc.	\$40,000	\$83,348
18	Pharmacy Professionals of California	\$32,000	\$0

TOP DRUG MAKER RECIPIENTS

21	Lawmaker	Party/District	Amount
22	Sen. Richard Pan*	D-Sacramento	\$95,150
23	Assembly Speaker Toni Atkins	D-San Diego	\$90,250
24	Sen. Ed Hernandez*	D-Azusa	\$67,750
25	Sen. Holly Mitchell*	D-Los Angeles	\$60,107
26	Assemblyman Brian Maienschein*	R-San Diego	\$59,879
27	Senate President Pro Tem Kevin de León	D-Los Angeles	\$56,648
28	Sen. Isadore Hall	D-Compton	\$52,400

1	Sen. Jerry Hill	D-San Mateo	\$50,209
2	Assemblyman Henry Perea	D-Fresno	\$49,550
3	Assemblywoman Shirley Weber	D-San Diego	\$47,000
4	Assemblyman Mike Gatto	D-Los Angeles	\$46,491
5	Assemblywoman Susan A. Bonilla*	D-Concord	\$45,600
6	Sen. Andy Vidak	R-Hanford	\$42,800
7	Assemblyman Tom Daly	D-Anaheim	\$40,300
8	Assemblyman Kevin Mullin	D-South San Francisco	\$38,400
9	Assemblyman Adam Gray	D-Merced	\$37,000
10	Assemblyman Rob Bonta*	D-Alameda	\$36,750
11	Assemblyman Anthony Rendon	D-Lakewood	\$36,200
12	Assemblyman Jimmy Gomez*	D-Los Angeles	\$33,850
13	Assemblyman Richard Gordon	D-Menlo Park	\$33,100

14 *Member of the Assembly or Senate health committees

15 Source: Bee analysis of secretary of state campaign finance and lobbying reports.

16 **107.** Pharmaceutical companies and their trade groups gave more than \$2 million
 17 to current members of the Legislature in 2013-2014, about 2 percent of the total
 18 raised, records show. Nine of the top 20 recipients are either legislative leaders or
 19 serve on either the Assembly or Senate health committees. Receiving more than
 20 \$95,000, the top recipient of industry campaign cash is Defendant Sen. Richard
 21 Pan, a Sacramento Democrat and doctor who is carrying the vaccine bill.

22
 23 **108.** In addition, the industry donated more than \$500,000 to outside campaign
 24 spending groups that helped elect some current members last year. Leading
 25 pharmaceutical companies also spent nearly \$3 million more during the 2013-2014
 26 legislative sessions lobbying the Legislature, the governor, the state pharmacists'
 27 board and other agencies, according to state filings. In short, the Defendant
 28 legislators, including Defendant Gerald Brown where bought and paid for by the