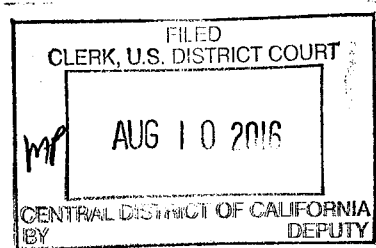


1 Travis Middleton  
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4 Travis m 93101@yahoo.com  
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6 Pro Se



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

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

23 Plaintiffs,

24 vs.

25 Richard Pan, Win-Li Wang, Martin  
26 Jeffrey "Marty" Block, Cindy Block,  
27 Gerald A. "Jerry" Hill, Sky Hill, Holly  
28 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  
Quirk, Laurel Quirk, Lorena Gonzalez,

Incorporated Case No.:  
LA CV16-05224-SVW-AGR  
VERIFIED 1<sup>st</sup> AMENDED  
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 Reginald Jones-Sawyer, Isadore Hall,  
 2 Mark Leno, Douglas Jackson, Bob  
 3 Wieckowski, Sue Lemke, David Chiu,  
 4 Candace Chen, Evan Low, Anthony  
 5 Rendon, Annie Lam, Jim Beall, Robert  
 6 Hertzberg, Mike McGuire, Erika  
 7 McGuire, Lois Wolk, Bruce Wolk, Jim  
 8 Cooper, Kristen Cooper, Kevin  
 9 McCarthy, Judy McCarthy, Mark Stone,  
 10 Kathy Stone, Edmund G. Brown Jr.,  
 11 Anne Gust, The State of California and  
 12 DOES 1 through 10,

13 Defendants.

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

16 **COMPLAINT**

17 COMES NOW Plaintiffs, bringing this Incorporated Case, under the  
 18 American Flag of peace, and states:

19 Ex rel.: for the people of the united states; "...But it is the manner of enforcement  
 20 which gives Title 42 U.S.C. 1983 its unique importance, for the enforcement is  
 21 placed in the hands of the people." Each citizen "acts as a private attorney  
 22 general who takes on the mantle of the sovereign, guarding for all of us the  
 23 individual liberties enunciated in the constitution." Section 1983 represents a  
 24 balancing feature in our government structure whereby individual citizens are  
 25 encouraged to police those who are charged with policing us all. Thus, it is of  
 26 special importance that suits brought under this statute be resolved by a  
 27 determination of truth." Wood v. Breir, 54 F.R.D. 7, (1972).

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

12 The object of civil RICO is thus not merely to compensate victims but to  
13 turn them into prosecutors, "private attorneys general," dedicated to eliminating  
14 racketeering activity. <sup>3</sup> *Id.*, at 187 (citing *Malley-Duff*, 483 U.S., at 151). (Civil  
15 RICO specifically has a "further purpose [of] encouraging potential private  
16 plaintiffs diligently to investigate"). The provision for treble damages is  
17 accordingly justified by the expected benefit of suppressing racketeering activity,  
18 an object pursued the sooner the better. [Rotella v. Wood et al., 528 U.S. 549  
19 (2000)] [bold and underline emphases added]. This Incorporated Case affirms  
20 evidence of multiple constitutional and civil right violations pursuant to 42 USC  
21 1983, which has inflicted irreparable harm on Citizens of the State of California,  
22 all of the above named Plaintiffs, Parties Injured. This Incorporated Case may  
23 identify acts prohibited under 18 U.S.C. 1961 through 18 U.S.C. 1964 and by  
24 enforcement, committing the undersigned into “involuntary servitude” in  
25 violation of the Thirteenth Amendment to the United States Constitution and or  
26 under “full faith and credit” of the united States of America.  
27 Definition: “Case Incorporated”, the formation of a legal body, with the quality  
28 of perpetual existence and succession. (2). Consisting of an association of

1 numerous individuals. (3). Matters relating to the common purpose of the  
2 association, within the scope of the powers and authorities conferred upon such  
3 bodies with the quality of perpetual existence and successions. Ref. Black's Law  
4 Dictionary 67<sup>th</sup> Pg. 690. "Case Incorporation" will establish the legal bounds of  
5 the members of this lawful assembly to solve a specific "Case Number" and the  
6 issues in motion.

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

9  
10 **STATEMENT OF THE CASE**

11  
12 -When injustice becomes law, rebellion becomes duty-.

13  
14 In 1932 the U.S. Public Health Service began a study of the natural  
15 progression of untreated syphilis in rural African-American men in Alabama  
16 under the auspices of receiving free health care from the United States  
17 government. It was called the "Tuskegee Study of Untreated Syphilis in the  
18 Negro Male." The study initially involved 600 black men – 399 with syphilis,  
19 201 who did not have the disease. The study was conducted without the benefit  
20 of patients' informed consent. Researchers told the men they were being treated  
21 for "bad blood," a local term used to describe several ailments, including syphilis,  
22 anemia, and fatigue. In truth, they did not receive the proper treatment needed to  
23 cure their illness. In exchange for taking part in the study, the men received free  
24 medical exams, free meals, and burial insurance. Although originally projected to  
25 last 6 months, the study actually went on for 40 years and ended officially in  
26 1972. Their doctors had no intention of curing them of syphilis at all. The data  
27 for the experiment was to be collected from autopsies of the men, and they were  
28 thus deliberately left to degenerate under the ravages of tertiary syphilis—which

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

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

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

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

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

1 **Aluminum hydroxide & aluminum phosphate:**

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

9 According to the FDA, Aluminum may reach toxic levels with prolonged  
10 parenteral feeding . . . Research indicates that patients with impaired kidney  
11 function, including premature neonates [babies], who received parenteral levels  
12 of aluminum at greater than 4 to 5 micrograms per kilogram of body weight per  
13 day, accumulate aluminum at levels associated with central nervous system and  
14 bone toxicity. Tissue loading may occur at even lower rates of administration.”  
15 Also, according to government documents, “Aluminum content in parenteral  
16 drug products could result in a toxic accumulation of aluminum in individuals  
17 receiving TPN therapy. Research indicates that neonates and patient populations  
18 with impaired kidney function may be at high risk of exposure to unsafe amounts  
19 of aluminum. Studies show that aluminum may accumulate in the bone, urine,  
20 and plasma of infants receiving TPN. Many drug products used in parenteral  
21 therapy may contain levels of aluminum sufficiently high to cause clinical  
22 manifestations . . . parenteral aluminum bypasses the protective mechanism of the  
23 GI tract and aluminum circulates and is deposited in human tissues. Aluminum  
24 toxicity is difficult to identify in infants because few reliable techniques are  
25 available to evaluate bone metabolism in . . . infants . . . Although aluminum  
26 toxicity is not commonly detected clinically, it can be serious in selected patient  
27 populations, such as neonates, and may be more common than is recognized.

1 From these documents we learn that if a premature baby receives more than 10  
2 mcg per day of aluminum in an IV, it can accumulate in their bones and brain,  
3 and can be toxic.

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

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

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

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

26 The counter argument is that in parenteral feeding, all the aluminum goes  
27 instantaneously into the circulation, while in vaccines only a portion goes into the  
28



1 circulatory system. Still, it is reasonable to question the safety of aluminum doses  
2 that are many times higher than those considered safe for parenteral feeding.

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

10 **Formaldehyde (embalming fluid):**

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

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

22 Ingestion: Ingestion of as little as 30 ml of a 37 percent solution of formaldehyde  
23 (formalin) can result in death. Gastrointestinal toxicity after ingestion is most  
24 severe in the stomach and results in symptoms which can include nausea,  
25 vomiting, and severe abdominal pain. Diverse damage to other organ systems  
26 including the liver, kidney, spleen, pancreas, brain, and central nervous systems  
27 can occur from the acute response to ingestion of formaldehyde. Long term  
28 exposure to formaldehyde has been shown to be associated with an increased risk

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

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

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

13 [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](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).

### 19 **Mercury Thimerosal**

20 Thimerosal is a preservative containing approximately 50 percent mercury.

21 Mercury is the second most poisonous element known to man (next to uranium  
22 and its derivatives). When someone says, “Mercury!” we immediately think of  
23 the news stories about the child at school who broke a thermometer in biology  
24 class and the hazmat team was called in. All the students were in peril. Hazmat  
25 teams are called in for less mercury than the amount contained in one vaccine.  
26 Thimerosal prevents bacteria growth in multi-use vaccines. It was removed from  
27 many vaccines in 2004—at which time more vaccines containing aluminum were  
28 added to the schedule, while mercury-laden flu vaccines were then recommended

1 for infants, and two years later for pregnant women, Mercury is also used in the  
2 vaccine creation process and then through a purification procedure it is  
3 purportedly "removed". However, in some vaccines, "trace" amounts are still  
4 left.

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

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

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

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

22 "No batch of vaccine can be proved safe before it is given to children." Surgeon  
23 General of the United States Leonard Scheele, addressing an AMA convention in  
24 1955.

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

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

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

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

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

26 The Defendants are using Child Protective Services, local law,  
27 enforcement agencies, public health agencies and the various California  
28 Superintendent of Schools as their affiliates to intimidate, incarcerate and coerce

1 the people of California to comply with this unlawful, tyrannical bill. The  
2 Defendants have unlawfully used the California legislative process in furtherance  
3 of their objective to subject Californians to chemical and biological warfare for  
4 their own financial gain and profit. This "R.I.C.O." law suit documents a  
5 continuous pattern of violations of federally protected rights perpetrated against  
6 Plaintiffs and other California residents by Defendants and their known and  
7 unknown affiliates.

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

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

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

22  
23 **JURISDICTION**

- 24  
25 1. This action arises under the provisions of the Racketeering Influenced and  
26 Corrupt Organizations Act, Title 18 U.S.C. §§ 1961- 1964.  
27 2. 18 U.S.C. § 1964(a) and (c)(a). The district courts of the United States shall  
28 have jurisdiction to prevent and restrain violations of section 1962 of this

1 chapter by issuing orders including, but not limited to: ordering any person  
2 to divest himself of any interest, direct or indirect, in any enterprise  
3 imposing reasonable restrictions on the future activities or investments of  
4 any person including, but not limited to, prohibiting any person from  
5 engaging in the same type of endeavor as the enterprise engaged in, the  
6 activities of which affect interstate or foreign commerce or ordering  
7 dissolution or reorganization of any enterprise, making due provisions for  
8 the rights of innocent persons.

9 (C) Any person injured in his business or property by reason of a violation  
10 of section 1962 of this chapter may sue therefore in any appropriate  
11 United States district court and shall recover threefold the damages he  
12 sustains and the cost of the suit, including reasonable attorney's fees.

- 13 3. 28 U.S.C. §§ 1343 and the First Amendment to the United States  
14 Constitution which provides for a *federal court forum* in which citizens may  
15 seek regress from the deprivation of rights, privileges, and immunities under  
16 color of state law.
- 17 4. 28 U.S.C. § 1331, the general federal question statute. 28 U.S.C. § 2201 and  
18 § 2202, the federal declaratory relief and injunctive relief statutes, to declare  
19 the rights of the parties.
- 20 5. 28 U.S.C. § 1332 (a)(1), diversity of jurisdiction of citizens of different  
21 states and the amount of controversy exceeds \$75,000.00.
- 22 6. This Court may exercise supplemental jurisdiction pursuant to 28 U.S.C. §  
23 1367(a) over Plaintiffs' state law claims for violations of The California  
24 Constitution Article 1 § 1 that guarantees all people the right to life, liberty,  
25 pursuing and obtaining safety, happiness, and privacy. And Article 1 § 4 of  
26 the California Constitution, which provides that The Legislature shall make  
27 no law respecting an establishment of religion, as these claims are so related  
28 to the Plaintiffs' claims in the action within the original federal question

1 jurisdiction that it forms part of the same case or controversy under Article  
2 III of the United States Constitution.

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

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

9 **VENUE**

10 9. Venue of this Court is proper pursuant to Title 28 U.S.C. § 1391(a)(2), (b)(2),  
11 because the subject conduct of the defendants is based upon the wrongful acts  
12 and harm inflicted against the Plaintiffs by all Defendants complained of  
13 herein while Defendants where acting as Agents or Assigns of the People of,  
14 and or the State of California.  
15

16 **PARTIES**

17 **Plaintiffs**

18 10. Plaintiff Travis Middleton, is a private citizen residing in the State of  
19 California at 27 West Anapamu Street No. 153 Santa Barbara, California  
20 93101.

21 11. Plaintiff Eric Durak is a private citizen residing in the State of California at  
22 133 Campo Vista Drive Santa Barbara, California 93111.

23 12. Plaintiff Jade Baxter is a private citizen residing in the State of California at  
24 207 West Victoria Street Santa Barbara, California 93101.

25 13. Plaintiff Julianna Pearce is a private citizen residing in the State of  
26 California at 28780 My Way, Oneals, California 93645.

27 14. Plaintiff Candyce Estaves is a private citizen with a vaccine injured  
28 Son and daughter residing in the State of California at 430 East Rose

1 Avenue Santa Maria California 93454.

2 15. Plaintiff Denise Michelle Derusha is a private citizen residing in the State of  
3 California at 7125 Santa Ysabel Apt. 3 Atascadero, California 93422.

4 16. Plaintiff Melissa Christou is a private citizen residing in the State of  
5 California at 1522 knoll Circle Drive Santa Barbara, California 93101.

6 17. Plaintiff Andrea Lewis is a private citizen residing in the State of California  
7 at 1331 Santa Barbara St. # 10, Santa Barbra, California 93101.

8 18. Plaintiff Rachil Vincent is a private citizen residing in the State of California  
9 at 4320 Viua Presada, Santa Barbara, California 93110.

10 19. Plaintiff Jackie Kozak is a private citizen residing in the State of California at  
11 1573 Lyndhivist Ave Camarillo, California 93010.

12 20. Plaintiff Don Demanlevesde is a private citizen residing in the State of  
13 California at 618 West Ortega Santa Barbara, California 93111.

14 21. Plaintiff Jessica Haas is a private citizen residing in the State of California at  
15 2715 Verde Vista Santa Barbara, California 93105.

16 22. Plaintiff Paige Murphy is a private citizen residing in the State of California  
17 at 2230 Memory Lane West Lake Village, California 91361.

18 23. Plaintiff Christie Macias is a private citizen residing in the State of California  
19 at 618 West Ortega Santa Barbara, California 93101.

20 24. Plaintiff Lori Strantz is a private citizen residing in the State of California at  
21 120 Barranca #B Santa Barbara, California 93109.

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

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

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

28 30. Plaintiff Pam Corner is a private citizen residing in the State of California at



1 613 West Micheltoarena Street, Santa Barbara, California 93101.

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

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

6 33. Plaintiff Bret Nielsen is a private citizen residing in the State of California at  
7 2230 Memory Lane West Lake Village, California 91361.

8 34. Plaintiff Brent Haas is a private citizen residing in the State of California at  
9 2715 Verde Vista Santa Barbara, California 93105.

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

12 36. Plaintiff Andy Taft is a private citizen residing in the State of California at  
13 1482 Menora Street Carpinteria, California 93103.

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

16  
17 **Defendants**

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

21  
22 **39.** Defendant Win-Li Wang, herein after (“Defendant Wang”) is and was at all  
23 times material in this complaint, the wife of Defendant Richard Pan, a private  
24 citizen doing business in the State of California with a business address of 4136 E.  
25 Commerce Way, Suite 100, Sacramento, California 95834.

26  
27 **40.** Defendant Martin Jeffrey “Marty” Block, herein after (“Defendant Marty  
28 Block”) is and was at all times material in this complaint a California legislator

1 within the State of California with a business address of the State Capitol, Room  
2 4072 Sacramento, CA 95814.

3  
4 **41.** Defendant Cindy Block, herein after (“Defendant Cindy Block”) is and was at  
5 all times material in this complaint the wife of Defendant Martin “Marty” Block, a  
6 private citizen with a business address of the State Capitol, Room 4072  
7 Sacramento, CA 95814.

8  
9 **42.** Defendant Gerald A. “Jerry” Hill, herein after (“Defendant G. Hill”) is and was  
10 at all times material in this complaint a California legislator within the State of  
11 California with a business address of the State Capitol, Room 5035 Sacramento,  
12 California 95814-4900.

13  
14 **43.** Defendant Sky Hill, herein after (“Defendant Sky Hill”) is and was at all times  
15 material in this complaint the wife of Defendant Gerald Hill, a private citizen with  
16 a business address of the State Capitol, Room 5035 Sacramento, California 95814-  
17 4900.

18  
19 **44.** Defendant Holly Mitchell, herein after (“Defendant Mitchell”) is and was at all  
20 times material in this complaint a California legislator within the State of  
21 California with a business address of the State Capitol, Room 5080, Sacramento,  
22 California 95814.

23  
24 **45.** Defendant Catharine Baker, herein after (“Defendant Baker”) is and was at all  
25 times material in this complaint a California legislator within the State of  
26 California with a business address of the Capitol Office, the State Capitol  
27 Sacramento, California 94249.

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

5  
6 **47.** Defendant Christina Garcia, herein after (“Defendant Garcia”), 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 P.O. Box 942849  
9 Sacramento, California 94249-005858.

10  
11 **48.** Defendant Adrin Nazarian, herein after (“Defendant Nazarian”), is and was at  
12 all times material in this complaint a California legislator within the State of  
13 California with a business address of the State Capitol Post Office Box 942849  
14 Sacramento, California 94249-0046.

15  
16 **49.** Defendant Diana Nazarian, herein after (“Defendant Diana Nazarian”), is and  
17 was at all times material in this complaint the wife of Defendant Adrin Nazarian  
18 and a private citizen with a business address of the State Capitol Post Office Box  
19 942849 Sacramento, California 94249-0046.

20  
21 **50.** Defendant Jim Wood, herein after (“Defendant Wood”), is and was at all times  
22 material in this complaint a California legislator within the State of California with  
23 a business address of the State Capitol P.O. Box 942849, Room 6005 Sacramento,  
24 California 94249-0002.

25  
26 **51.** Defendant Jane Wood, herein after (“Defendant Jane Wood”), is and was at all  
27 times material in this complaint the wife of Defendant Jim Wood and a private  
28

1 citizen with a business address of the State Capitol P.O. Box 942849, Room 6005  
2 Sacramento, California 94249-0002.

3  
4 **52.** Defendant Ben Allen, herein after (“Defendant Allen”), is and was at all times  
5 material in this complaint a California legislator within the State of California with  
6 a business address of the State Capitol, Room 2054 Sacramento, California 95814.

7  
8 **53.** Defendant Kevin de Leon, herein after (“Defendant de Leon”), is and was at all  
9 times material in this complaint a California legislator within the State of  
10 California with a business address of the State Capitol, Room 205 Sacramento,  
11 California 95814.

12  
13 **54.** Defendant Hannah-Beth Jackson, herein after (“Defendant Jackson”), is and  
14 was at all times material in this complaint a California legislator within the State of  
15 California with a business address of the State Capitol, Room 2032 Sacramento,  
16 California 95814.

17  
18 **55.** Defendant George Eskin, herein after (“Defendant Eskin”), is and was at all  
19 times material in this complaint the spouse of Defendant Hannah-Beth Jackson  
20 with a business address of the State Capitol, Room 2032 Sacramento, California  
21 95814.

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

25  
26 **57.** Defendant Richard Bloom, herein after (“Defendant Bloom”), is and was at all  
27 times material in this complaint a California legislator within the State of  
28 California with a business address of Room 2003, State Capitol 1303 Tenth Street

1 Sacramento, California 9581468.

2  
3 **58.** Defendant Robbie Black, herein after (“Defendant Black”), is and was at all  
4 times material in this complaint the wife of Defendant Richard Bloom with a  
5 business address of Room 2003, State Capitol 1303 Tenth Street  
6 Sacramento, California 9581468.

7  
8 **59.** Defendant Bill Quirk, herein after (“Defendant Quirk”), is and was at all times  
9 material in this complaint a California legislator within the State of California with  
10 a business address of the State Capitol P.O. Box 942849 Sacramento, California  
11 94249-0020.

12  
13 **60.** Defendant Laurel Quirk, herein after (“Defendant Laurel Quirk”), is and was at  
14 all times material in this complaint the wife of Defendant Bill Quirk with a  
15 business address of the State Capitol P.O. Box 942849 Sacramento, California  
16 94249-0020.

17  
18 **61.** Defendant Lorena Gonzales, herein after (“Defendant Gonzales”), is and was at  
19 all times material in this complaint a California legislator within the State of  
20 California with a business address of the State Capitol P.O. Box 942849  
21 Sacramento, California 94249-0080.

22  
23 **62.** Defendant Reginald Jones-Sawyer, herein after (“Defendant Sawyer”), is and  
24 was at all times material in this complaint a California legislator within the State of  
25 California with a business address of the State Capitol P.O. Box 942849  
26 Sacramento, California 94249-0059.

1 **63.** Defendant Isadore Hall, herein after (“Defendant Hall”), is and 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 4085 Sacramento, California  
4 95814.

5  
6 **64.** Defendant Mark Leno, herein after (“Defendant Leno”), is and was at all times  
7 material in this complaint a California Legislator within the State of California  
8 with a business address of the State Capitol, Room 5100 Sacramento, California  
9 95814-4900.

10  
11 **65.** Defendant Douglas Jackson, herein after (“Defendant Jackson”), is and was at  
12 all times material in this complaint the spouse or life partner of Defendant Leno  
13 with a business address of the State Capitol, Room 5100 Sacramento, California  
14 95814-4900.

15  
16 **66.** Defendant Bob Wieckowski, herein after (“Defendant Wieckowski”), is and  
17 was at all times material in this complaint a California Legislator within the State  
18 of California with a business address of the State Capitol, Room 3086 Sacramento,  
19 California 95814.

20  
21 **67.** Defendant Sue Lemke, herein after (“Defendant Lemke”), is as was at all times  
22 material in this complaint the spouse of Defendant Wieckowski with a business  
23 address of the State Capitol, Room 3086 Sacramento, California 95814.

24  
25 **68.** Defendant David Chiu, herein after (“Defendant Chiu”), is and was at all times  
26 material in this complaint a California Legislator within the State of California  
27 with a business address of 2196 Legislative Office Building Sacramento,  
28 California 94249-0017.

1 **69.** Defendant Candace Chen, herein after (“Defendant Chen”), is and was at all  
2 times material in this complaint the spouse of Defendant David Chiu with a  
3 business address of 433 California Street, Suite 815 San Francisco, California  
4 94104.

5  
6 **70.** Defendant Evan Low, herein after (“Defendant Low”), is and was at all times  
7 material in this complaint a California Legislator within the State of California  
8 with a business address of the state capitol Room 2175 Sacramento, California  
9 94249-0028.

10  
11 **71.** Defendant Anthony Rendon, herein after (“Defendant Rendon”), is as was at  
12 all times material in this complaint a California Legislator within the State of  
13 California with a business address of Room 219 State Capitol 1303 Tenth Street  
14 Sacramento, California 95814.

15  
16 **72.** Defendant Annie Lam herein after (“Defendant Lam”), is and was at all times  
17 material in this complaint the spouse of Defendant Rendon with a business address  
18 of Room 219 State Capitol 1303 Tenth Street  
19 Sacramento, California 95814.

20 **73.** Defendant Jim Beall, herein after (“Defendant Beall”), is as was at all times  
21 material in this complaint a California Legislator within the State of California  
22 with a business address of the State Capitol, Room 5066 Sacramento, California  
23 95814.

24  
25 **74.** Defendant Pat Lafkas, herein after (“Defendant Lafkas”), is and was at all  
26 times material in this complaint the spouse of Defendant Beall with a business  
27 address of the State Capitol, Room 5066 Sacramento, California 95814.  
28

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

5  
6 **76.** Defendant Mike McGuire, herein after (“Defendant McGuire”), is as 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 1303 10th Street, Room  
9 5064 Sacramento, California 95814.

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

15  
16 **78.** Defendant Lois Wolk, herein after (“Defendant Lois Wolk”), is and was at all  
17 times material in this complaint a California Legislator within the State of  
18 California with a business address of the State Capitol, Room 5114 Sacramento,  
19 California 95814.

20 **79.** Defendant Bruce Wolk, herein after (“Defendant Bruce Wolk”), is and was at  
21 all times material in this complaint the spouse of Defendant Lois Walk with a  
22 business address of the U.C. Davis Law School, 1 Shields Ave, Davis, California  
23 95616.

24  
25 **80.** Defendant Jim Cooper, herein after (“Defendant Cooper”), 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 Post Office Box 942849  
28 Room 5158 Sacramento, California 95814.



1  
2 **81.** Defendant Kristen Cooper, herein after (“Defendant Kristen Cooper”), is as  
3 was at all times material in this complaint the spouse of Defendant Jim Cooper  
4 with a business address of the State Capitol Post Office Box 942849 Room 5158  
5 Sacramento, California 95814.

6  
7 **82.** Defendant Kevin McCarthy, herein after (“Defendant McCarthy”), is and was  
8 at all times material in this complaint a California Legislator within the State of  
9 California with a business address of 4100 Empire Drive Suite 150 Bakersfield,  
10 California 93309.

11  
12 **83.** Defendant Judy McCarthy, herein after (“Defendant Judy McCarthy”), is and  
13 was at all times material in this complaint the spouse of Defendant Kevin  
14 McCarthy with a business address of 4100 Empire Drive Suite 150 Bakersfield,  
15 California 93309.

16  
17 **84.** Defendant Mark Stone, herein after (“Defendant Mark Stone”), is and was at  
18 all times material in this complaint a California Legislator within the State of  
19 California with a business address of the State Capitol, Room 5155, 1303 Tenth  
20 Street Sacramento, California 95814 95.

21  
22 **85.** Defendant Kathy Stone, herein after (“Defendant Kathy Stone”), is and was at  
23 all times material in this complaint the spouse of Defendant Mark Stone with a  
24 business address of the State Capitol, Room 5155, 1303 Tenth Street Sacramento,  
25 California 95814 95.

26  
27 **86.** Defendant Edmund Gerald “Jerry” Brown, Jr., herein after (“Defendant  
28 Brown”) is and was at all times mentioned in this complaint the governor of the

1 State of California with a business address of the State Capitol, suite 1173  
2 Sacramento, California 95814.

3  
4 **87.** Defendant Anne Gust, herein after (“Defendant Gust”) is and was at all times  
5 mentioned in this complaint the wife of Defendant Jerry Brown with a business  
6 address of the State Capitol, suite 1173 Sacramento, California 95814.

7  
8 **88.** Defendant the STATE OF CALIFORNIA, herein after (“Defendant  
9 CALIFORNIA”) is and was at all times mentioned in this complaint a corporate  
10 fiction with a business address of 1300 “I” Street Sacramento, California 95814-  
11 2919.

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

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

1 **FACTS APPLICABLE TO ALL CLAIMS FOR RELIEF**

2  
3 **91.** *“In around December 2014, it was reported that at least 40 visitors of*  
4 *Disneyland contracted measles at the park between December 17–20, 2014,*  
5 *triggering an outbreak, especially due to the presence of intentionally*  
6 *unvaccinated individuals. The likely “patient zero” was speculated to be an*  
*international visitor to the park”. Source, Wikipedia.com.*

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

9  
10 Quoting the L.A. Times: *“Although epidemiologists have not yet identified the*  
11 *person who brought measles to Disneyland, a new analysis shows that the highly*  
12 *contagious disease has spread to seven states and two other countries thanks to*  
*parents who declined to vaccinate their children”.*

13  
14 **93.** This statement is a total fabrication. Given the fact that the health officials  
15 have yet to properly identify the infected person who purportedly visited  
16 Disneyland, there is no way of determining how, where or who these alleged  
17 recipients contracted the measles from in the first place. Additionally, if the health  
18 officials have failed to identify the person who started the original infection, then it  
19 would be next to impossible to determine not only where this infamous person has  
20 been, where they’ve since traveled and how many others may or may not have  
21 come into contact with him or her. In any event, the infected people were identified  
22 and properly quarantined and treated. This seems hardly a need for a mandatory  
23 vaccine bill for all Californians.

24  
25  
26 **94.** If the other news sources are correct in that this person was from another  
27 country, how and why does this fact even remotely suggest that American parents  
28 who chose not to vaccinate “their” children (which according to California Health

1 officials make up only 2.5% of the populace), are somehow responsible for this so-  
2 called outbreak? Such a claim is dubious at best. There is no plausible scientific or  
3 other kind of evidence to support this nonsensical view. According to the CDC,  
4 *“Measles can be prevented with the MMR (measles, mumps, and rubella) vaccine.*  
5 *One dose of MMR vaccine is about 93% effective at preventing measles if exposed*  
6 *to the virus, and two doses are about 97% effective. In the United States,*  
7 *widespread use of measles vaccine has led to a greater than 99% reduction in*  
8 *measles cases compared with the pre-vaccine era. Since 2000, when measles was*  
9 *declared eliminated from the U.S., the annual number of people reported to have*  
10 *measles ranged from a low of 37 people in 2004 to a high of 668 people in 2014.*  
11 *Most of these originated outside the country or were linked to a case that*  
12 *originated outside the country”.*  
13  
14

15  
16 **95.** If the statistics from the CDC are true that the measles vaccine is 93% to 97%  
17 effective in preventing measles, and the measles have already been declared  
18 eliminated in the United States since 2000, then even if 37 people in 2004 and 668  
19 people in 2014 came down with measles, these numbers are still extremely small  
20 compared to the number of people living in the United States which is around 323  
21 million, 394 thousand people. California has nearly 39 million people. Out of 39  
22 million people, 30 to 40 infected people who got adequate medical care does not  
23 constitute an outbreak. And, according to the CDC, if the MMR vaccine is 93% to  
24 97% effective, then why and how did some of the vaccinated people who were  
25 exposed acquire the measles? This narrative by the CDC officials is pure fiction.  
26 Additionally, there is no evidence that unvaccinated children can infect people  
27 with diseases that they do not have. And, if the measles have been determined to  
28

1 have been eliminated from the U.S. which has estimated well over 323 million  
2 people, then in light of these numbers the whole Disneyland event is just another  
3 contradiction and falsehood.  
4

5 **96.** Also, how is it possible for the officials to make a determination of the cause  
6 and origin of the other purported seven states with infectious people? One could  
7 argue that these events are not related at all to the Disneyland event.  
8

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

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

21 *“The index patient in the 3-month-old Disneyland outbreak was probably exposed*  
22 *to the measles overseas and then visited the Anaheim amusement park while*  
23 *contagious, according to the Centers for Disease Control and Prevention. This*  
24 *particular strain of measles is identical to one that spread through the*  
25 *Philippines last year, where it sickened about 58,000 people and killed 110.*  
26 *No deaths have been traced to the Disneyland outbreak”.*  
27 [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)  
28 [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.

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

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

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

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

1  
2 **101.** In view of these severe discrepancies and falsehoods in the official reports of  
3 this Disneyland measles event, one could conclude that the whole event is a hoax  
4 on a grand scale and that the Defendants and their P.R. people should learn to lie  
5 better.

6 **The Lies Corruption and Deceit Continues on The Floor of The Legislature**  
7

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

17 **103.** According to an article from 2014 in the Sacramento Bee:  
18 “As a UC Davis pediatrician, Pan was an active member of the group that lobbies  
19 for doctors in the Capitol, known as the California Medical Association. Jodi Hicks  
20 was the association’s chief lobbyist. ... and is a partner in a Sacramento lobbying  
21 firm called DiMare, Brown, Hicks & Kessler. She routinely seeks Pan’s votes as  
22 she lobbies for clients that include associations representing family physicians, eye  
23 doctors and podiatrists. Those three groups have together given more than \$20,000  
24 to Pan’s campaign.”  
25

26 **104.** Hicks daughter, Seneca, appeared in Defendant Pan’s campaign  
27 commercials. Hicks said about her daughter Seneca appearing in Defendant Pan’s  
28 campaign commercials, “I don’t think anyone other than a few of us here in

1 Sacramento know it's a lobbyist's daughter." Interestingly enough, Jodi Hicks now  
 2 works for DiMare, Brown, Hicks & Kessler, LLC (DBHK) and was named Capitol  
 3 Weekly's "Top 100", an annual ranking of the most powerful players in California  
 4 politics. It is my opinion that Ms. Hicks is near the top of a dubious, stinking pile  
 5 of corruption.

6  
 7 **105.** Defendants Pan, Allen and Gonzalez then colluded and conspired with Jodi  
 8 Hicks and other lobbyist to encourage the other Defendant legislators through  
 9 monetary compensation to join in, support and pass SB277.

10  
 11  
 12 **106. TOP DRUG MAKER DONORS**

13  
 14 State records show that pharmaceutical companies and trade groups donated more  
 15 than \$2 million to current lawmakers in 2013-2014.

16 17 18	Pharmaceutical company or group	Campaign donations to current state legislators	Direct lobbying payments
19	Johnson & Johnson Inc.	\$86,300	\$583,926
20	GlaxoSmithKline	\$32,250	\$561,479
21	Eli Lilly & Company	\$193,100	\$280,863
22	Gilead Sciences Inc.	\$77,600	\$196,732
23	Biocom PAC	\$30,000	\$223,224
24	Sanofi	\$48,000	\$172,500
25	Abbott Laboratories	\$173,600	\$42,500
26	Astellas Pharma US Inc.	\$47,900	\$161,440
27	AstraZeneca Pharmaceuticals LLP	\$157,300	\$49,583
28	Merck & Co. Inc.	\$91,600	\$108,204
	California Pharmacists Association	\$53,389	\$134,176



1	Pharmaceutical Research &	\$137,950	\$45,455
2	Manufacturers Assn.		
3	Eisai Inc.	\$92,000	\$88,000
4	Bristol-Myers Squibb Company	\$32,300	\$144,101
5	Pfizer	\$150,600	\$21,250
6	AbbVie	\$138,425	\$25,530
7	Amgen	\$105,600	\$45,455
8	Allergan USA Inc.	\$120,100	\$22,757
9	Takeda Pharmaceuticals USA Inc.	\$40,000	\$83,348
10	Pharmacy Professionals of California	\$32,000	\$0

**TOP DRUG MAKER RECIPIENTS**

13	Lawmaker	Party/District	Amount
14	Sen. Richard Pan*	D-Sacramento	\$95,150
15	Assembly Speaker Toni Atkins	D-San Diego	\$90,250
16	Sen. Ed Hernandez*	D-Azusa	\$67,750
17	Sen. Holly Mitchell*	D-Los Angeles	\$60,107
18	Assemblyman Brian Maienschein*	R-San Diego	\$59,879
19	Senate President Pro Tem Kevin de León	D-Los Angeles	\$56,648
20	Sen. Isadore Hall	D-Compton	\$52,400
21	Sen. Jerry Hill	D-San Mateo	\$50,209
22	Assemblyman Henry Perea	D-Fresno	\$49,550
23	Assemblywoman Shirley Weber	D-San Diego	\$47,000
24	Assemblyman Mike Gatto	D-Los Angeles	\$46,491
25	Assemblywoman Susan A. Bonilla*	D-Concord	\$45,600
26	Sen. Andy Vidak	R-Hanford	\$42,800
27	Assemblyman Tom Daly	D-Anaheim	\$40,300
28	Assemblyman Kevin Mullin	D-South San Francisco	\$38,400
	Assemblyman Adam Gray	D-Merced	\$37,000

1	Assemblyman Rob Bonta*	D-Alameda	\$36,750
2	Assemblyman Anthony Rendon	D-Lakewood	\$36,200
3	Assemblyman Jimmy Gomez*	D-Los Angeles	\$33,850
4	Assemblyman Richard Gordon	D-Menlo Park	\$33,100

5 \*Member of the Assembly or Senate health committees

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

7  
 8 **107.** Pharmaceutical companies and their trade groups gave more than \$2 million  
 9 to current members of the Legislature in 2013-2014, about 2 percent of the total  
 10 raised, records show. Nine of the top 20 recipients are either legislative leaders or  
 11 serve on either the Assembly or Senate health committees. Receiving more than  
 12 \$95,000, the top recipient of industry campaign cash is Defendant Sen. Richard  
 13 Pan, a Sacramento Democrat and doctor who is carrying the vaccine bill.

14  
 15 **108.** In addition, the industry donated more than \$500,000 to outside campaign  
 16 spending groups that helped elect some current members last year. Leading  
 17 pharmaceutical companies also spent nearly \$3 million more during the 2013-2014  
 18 legislative sessions lobbying the Legislature, the governor, the state pharmacists'  
 19 board and other agencies, according to state filings. In short, the Defendant  
 20 legislators, including Defendant Gerald Brown where bought and paid for by the  
 21 drug companies to corruptly influence the outcome of the votes to pass SB277. All  
 22 one has to do is follow the money trail.

23  
 24 **109.** All of the corruption of the Defendant legislators in passing SB277 is  
 25 underscored by the criminal fraud and corruption being perpetrated by the Center  
 26 for Disease Control (CDC) with respect to the efficacy of the MMR and other  
 27 vaccines. Despite this fact the CDC has and is still standing on their claims that all  
 28 vaccines are safe, effective and needed by our society. This is yet another bright

1 and shining lie motivated around politicians and the drug cartels' financial  
2 incentives to keep getting richer at the expense of the health and well-being of  
3 Plaintiffs' offspring. Meanwhile the Vaccine Court in New York has paid out 3.2  
4 billion dollars in settlements for vaccine injured plaintiffs. Just taking into account  
5 the amount of pay-outs given to citizens who've been injured from vaccinations is  
6 enough proof that vaccines are not safe and not effective.

7  
8 **The CDC And Merck Has Come Under Fire Due To Corruption and Fraud**

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

11 "Merck, the pharmaceutical giant, is facing a slew of controversies over its  
12 Measles-Mumps-Rubella (MMR) vaccine following numerous allegations of  
13 wrongdoing from different parties in the medical field, including two former  
14 Merck scientists-turned-whistleblowers. A third whistleblower, this one a scientist  
15 at the Centers for Disease Control, also promises to bring Merck grief following  
16 his confession of misconduct involving the same MMR vaccine.

17  
18 The controversies will find Merck defending itself and its vaccine in at least two  
19 federal court cases after a U.S. District judge earlier this month threw out Merck's  
20 attempts at dismissal. Merck now faces federal charges of fraud from the  
21 whistleblowers, a vaccine competitor and doctors in New Jersey and New York.  
22 Merck could also need to defend itself in Congress: The staff of representative Bill  
23 Posey (R-Fla) -- a longstanding critic of the CDC interested in an alleged link  
24 between vaccines and autism -- is now reviewing some 1,000 documents that the  
25 CDC whistleblower turned over to them.

26  
27 The first court case, United States v. Merck & Co., stems from claims by two  
28 former Merck scientists that Merck "fraudulently misled the government and

1 omitted, concealed, and adulterated material information regarding the efficacy of  
2 its mumps vaccine in violation of the FCA [False Claims Act]."

3  
4 According to the whistleblowers' court documents, Merck's misconduct was far-  
5 ranging: It "failed to disclose that its mumps vaccine was not as effective as Merck  
6 represented, (ii) used improper testing techniques, (iii) manipulated testing  
7 methodology, (iv) abandoned undesirable test results, (v) falsified test data, (vi)  
8 failed to adequately investigate and report the diminished efficacy of its mumps  
9 vaccine, (vii) falsely verified that each manufacturing lot of mumps vaccine would  
10 be as effective as identified in the labeling, (viii) falsely certified the accuracy of  
11 applications filed with the FDA, (ix) falsely certified compliance with the terms of  
12 the CDC purchase contract, (x) engaged in the fraud and concealment describe  
13 herein for the purpose of illegally monopolizing the U.S. market for mumps  
14 vaccine, (xi) mislabeled, misbranded, and falsely certified its mumps vaccine, and  
15 (xii) engaged in the other acts described herein to conceal the diminished efficacy  
16 of the vaccine the government was purchasing."

17  
18 These fraudulent activities, say the whistleblowers, were designed to produce test  
19 results that would meet the FDA's requirement that the mumps vaccine was 95 per  
20 cent effective. To the whistleblowers' delight, the judge dismissed Merck's  
21 objections to the case proceeding, finding the whistleblowers had plausible  
22 grounds on all of the claims lodged against Merck.

23  
24 If the whistleblowers win, it would represent more than a moral victory (they  
25 repeatedly tried to stop Merck while still in its employ). Under the False Claims  
26 Act, the whistleblowers would receive a share -- likely 25 per cent to 30 per cent --  
27 of the amount the government recovers. Previous settlements involving extensive  
28 fraud by pharmaceutical companies under the False Claims Act have run into the

1 hundreds of millions of dollars, and in some cases such as against  
2 GlaxoSmithKline and Pfizer, into the billions.

3  
4 The second court case, Chatom Primary Care v. Merck & Co. relies on the same  
5 whistleblower evidence. This class action suit claims damages because Merck had  
6 fraudulently monopolized the mumps market. Doctors and medical practices in the  
7 suit would be able to obtain compensation for having been sold an overpriced  
8 monopolized product, and a defective one to boot, in that the mumps vaccine  
9 wasn't effective (indeed, the suit alleged that Merck expected outbreaks to  
10 occur and, as predicted, they did -- mumps epidemics occurred in 2006 in a highly  
11 vaccinated population and again in 2009-2010).

12  
13 "Plaintiffs have argued sufficient facts to sustain a claim for proximate causation,  
14 detailing the significant barriers that other companies would face to enter the  
15 mumps vaccine market," the court ruled.

16  
17 "The third whistleblower -- a senior CDC scientist named William Thompson --  
18 only indirectly blew the whistle on Merck. He more blew it on himself and  
19 colleagues at the CDC who participated in a 2004 study involving the MMR  
20 vaccine. Here, the allegations involve a cover-up of data pointing to high rates of  
21 autism in African-American boys after they were vaccinated with MMR. In what  
22 could be high-profile House hearings before Congressman Posey's Science  
23 Committee -- hearings made all the more explosive given the introduction of race  
24 into the mix -- Merck could find itself under unprecedented scrutiny. The CDC still  
25 stands by its study although Frank DeStefano, the CDC's Director of Immunization  
26 Safety and a co-author in the CDC study, also stated that he plans to review his  
27 notes with an eye to reanalyzing the data. Some say all publicity is good. In  
28 Merck's case, regardless of the ultimate merits, the publicity will be all bad."

1 *-Huffington Post.*

2  
3 **111.** The Defendants Pan, Allen, Gonzalez and the other Defendant legislators  
4 knew before hand of these lawsuits and were aware of the harmful heavy metals  
5 inside these vaccines long before the house and senate hearings on SB277. The  
6 Defendant legislators were at this point already paid off by the lobbyist from the  
7 pharmaceutical cartels and did not care about their lawful duty to do the right thing  
8 under the law as required by their oaths.

9  
10 **Defendants' Ongoing, Open-Ended Pattern of Racketeering Activity**

11  
12 **112.** On information and belief, in furtherance of their racketeering scheme the  
13 Defendant legislators routinely engaged in unlawful service and duties to their  
14 offices and to the citizens they purport to represent by accepting bribes in the form  
15 of money and other considerations from drug company lobbyists to pass legislation  
16 that extorts the rights of the citizens of California for the Defendants' own  
17 financial gain and profit. For purposes of this section, generic description of  
18 "bribery" is conduct which is intended, at least by the alleged briber, as an assault  
19 on the integrity of a public office or an official action. U.S. v. Forsythe, C.A.3 (Pa.)  
20 1977, 560 F.2d 1127.

21  
22 **113.** On information and belief, in furtherance of their racketeering scheme  
23 Defendant legislators routinely violate their Oaths of office which mandates that  
24 they support and defend the California and United States constitutions, including  
25 the Bill of Rights, from all enemies foreign and domestic, especially with respect  
26 to any law making activities affecting the liberties of the citizens of the state of  
27 California whom they purport to represent. The Defendant legislators willfully,

1 wantonly and recklessly violated their oaths to the California and U.S.  
2 constitutions by passing SB277.

3  
4 **114.** Further, on information and belief, in furtherance of their racketeering  
5 scheme Defendant legislators routinely have meetings on the house floor and  
6 senate to give the public the illusion that legitimate democratic processes are at  
7 work within the procedures and hearings of the state capitol building, when in fact  
8 Defendants collude and conspire with one another in conducting secret meetings  
9 behind closed doors before and afterwards to corruptly influence the outcome of  
10 the passage of certain bills for their own financial gain and profit, all while  
11 extorting the liberty and freedoms of Plaintiffs and other California residents.

12  
13 **115.** On information and belief, in furtherance of their racketeering scheme  
14 Defendant legislators routinely collude and conspire with one another to use the  
15 house and senate hearings at the state capital as their conduit and venue to extort  
16 the liberty and certain rights of Plaintiffs and other California citizens of their  
17 property, money and liberty by sham, oppressive legislation like SB277 and other  
18 similar bills.

19  
20 **116.** On information and belief, in furtherance of their racketeering scheme  
21 Defendant legislators' receive the financial benefit of their corrupt activities  
22 through their salaries and pensions which are all directly or indirectly derived from  
23 the activities of their standard pay which is over \$97,000 per annum plus the illegal  
24 contributions and bribes from the drug companies and their lobbyist while in  
25 office.

26  
27 **117.** On information and belief, in furtherance of their racketeering scheme, Co-  
28 conspirators Defendant legislators' spouses have conspired to aid, abet, encourage

1 and supported the Defendant legislators in their corrupt and criminal enterprises  
2 while receiving the financial benefit of their public officials' corrupt activities.  
3 These Defendant spouses and Co-conspirators are, Win-Li Wang, Cindy Block,  
4 Sky Hill, Dan Baker, Diana Nazarian, Jane Wood, George Eskin, Robbie Black,  
5 Laurel Quirk, Douglas Jackson, Sue Lemke, Candace Chen, Annie Lam, Pat  
6 Lafkas, Erika McGuire, Bruce Wolk, Kristen Cooper, Judy McCarthy, Kathy Stone  
7 and Anne Gust.

8  
9 **Defendants' Predicate Acts of Obstruction of Justice & Conspiracy to**  
10 **Obstruct Justice**

11  
12 **118.** Defendant legislators, including Defendant Edmund Brown on behalf of the  
13 Defendant State of California, have conspired with, aided, abetted, colluded and  
14 agreed with one another to engage in a continuous pattern of racketeering activity  
15 as defined in 18 U.S.C. § 1961 Subsection 1503, in that they have engaged in two  
16 or more predicate acts of Obstruction of Justice within the preceding two years  
17 using the California Legislature as a conduit as described herein.

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



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

2 -Whoever corruptly, or by threats or force, or by any threatening letter or  
3 communication influences, obstructs, or impedes or endeavors to influence,  
4 obstruct, or impede the due and proper administration of the law under which any  
5 pending proceeding is being had before any department or agency of the United  
6 States (the State of California is enjoined and incorporated into the United States as  
7 an agency and or subsidiary by and through the 14<sup>th</sup> Amendment) , or the due and  
8 proper exercise of the power of inquiry under which any inquiry or investigation is  
9 being had by either House, or any committee of either House or any joint  
10 committee of the Congress.

11 - Whoever corruptly, or by threats or force, or by any threatening letter or  
12 communication, endeavors to influence, intimidate, or impede..... or by any  
13 threatening letter or communication, influences, obstructs, or impedes, or  
14 endeavors to influence, obstruct, or impede, the due administration of justice, shall  
15 be punished as provided in subsection (b).

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

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

18 (2) In the case of an attempted killing, or a case in which the offense was  
19 committed against a petit juror and in which a class A or B felony was charged,  
20 imprisonment for not more than 20 years, a fine under this title, or both; and  
21

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

24  
25 **FIRST CLAIM FOR RELIEF FOR VIOLATION OF**  
26 **THE RACKETEERING INFLUENCED AND CORRUPT**  
27 **ORGANIZATIONS ACT ("RICO") 18 U.S.C. § 1961**  
28 **(By Plaintiffs Against All Defendants)**

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

3  
4 **122.** A “R.I.C.O.” enterprise may include courts. *United States v. Angelilli*, 660  
5 F.2d 23 (2nd Cir. 1981). (See *United States v. Thompson*, 685 F.2d 993  
6 (6th Cir. 1982), alleging that governor’s office in Tennessee was a criminal  
7 enterprise.) See also *United States v. Stratton*, 649 F.2d 1066 (1981) alleging  
8 that Florida’s Third Judicial Circuit met the requisite of a “RICO” enterprise;  
9 *United States v. Clark*, 646 F.2d 1259 (8th Cir. 1981), holding that a  
10 governmental agency can be a RICO enterprise, and listed several, including  
11 examples: the office of county judge to be an enterprise under the “RICO”  
12 Act and any other government agencies or offices; *United States v. Altomare*,  
13 625 F.2d 5, 7, n.7 (4th Cir. 1980), the office of county prosecutor; *United*  
14 *States v. Grzywacz*, 603 F.2d 682, 686 (7th Cir. 1979), the city police  
15 department. Among the government units that have been held to be  
16 enterprises" are offices of **governors and state legislators**, courts and court  
17 clerks' offices. See e.g., *United States v. Stratton*, 649 F.2d 1066, 1072-75 (5th  
18 Cir. 1981);

19 **123.** The “R.I.C.O.” enterprise described herein consists of all the named  
20 Defendants: Richard Pan, Win-Li Wang, Martin Jeffrey “Marty” Block, Cindy  
21 Block, Gerald A. “Jerry” Hill, Sky Hill, Holly Mitchell, Catharine Baker, Dan  
22 Baker, Christina Garcia, Adrin Nazarian, Diana Nazarian, Jim Wood, Jane  
23 Wood, Ben Allen, Kevin de Leon, Hannah-Beth Jackson, George Eskin, Jeff  
24 Stone, Richard Bloom, Robbie Black, Bill Quirk, Laurel Quirk, Lorena Gonzalez,  
25 Reginald Jones-Sawyer, Isadore Hall, Mark Leno, Douglas Jackson, Bob  
26 Wieckowski, Sue Lemke, David Chiu, Candace Chen, Evan Low, Anthony  
27 Rendon, Annie Lam, Jim Beall, Robert Hertzberg, Mike McGuire, Erika  
28 McGuire, Lois Wolk, Bruce Wolk, Jim Cooper, Kristen Cooper, Kevin

1 McCarthy, Judy McCarthy, Mark Stone, Kathy Stone, Edmund G. Brown Jr.,  
2 Anne Gust and The State of California.

3  
4 **124.** At all relevant times herein, all Defendants and the Co-conspirators were  
5 “persons” within the meaning of RICO, 18 U.S.C. §§ 1961(3) and 1964(4).  
6

7 **125.** At all relevant times herein, Defendants and Co-conspirators formed an  
8 association-in-fact for the specific purpose of extorting the constitutional rights of  
9 Plaintiffs, their school-age offspring and those similarly situated as such rights  
10 are guaranteed and secured by the First Amendment (right of deeply held  
11 spiritual beliefs in rejecting having certain animal and or human tissues or  
12 poisonous chemicals forced into their offspring’s bodies; the rights of parents to  
13 choose a particular medical procedure with respect to their offspring whether  
14 born or unborn; the right to informed consent over a medical procedure regarding  
15 their offspring); and, by the Fourth Amendment (the right of privacy and to be let  
16 alone by government, or anyone or any agency acting on government’s behalf);  
17 and, by the Fifth Amendment (the right not to be assaulted, maimed or killed with  
18 a needle filled with poisonous substances without due process of law, or the right  
19 not to lose their life, health, well-being or liberty without due process of law);  
20 and, by the Ninth Amendment (the fundamental and common law right of life,  
21 liberty, and right to protect the life, health, well-being and liberty of their  
22 offspring); and, by the Fourteenth Amendment (the right of due process of law  
23 before any rights may be taken away, and the equal protection of ALL laws state  
24 and federal including but not limited to the right to opt out of any tyrannical  
25 governmental medical experiment or treatment.  
26

27 **126.** This association-in-fact was an “enterprise” within the meaning of RICO,  
28 18 U.S.C. § 1961(4).

1 **127.** At all relevant times herein, this “law” making enterprise was engaged in,  
2 and its activities affected interstate and foreign commerce, within the meaning of  
3 RICO, 18 U.S.C. § 1961 (Sec. 1951).  
4

5 **128.** At all relevant times herein, all Defendants and other Co-conspirators  
6 associated with this enterprise conducted or participated directly or indirectly, in  
7 the conduct of the enterprise’s affairs through a “pattern of racketeering activity”  
8 within the meaning of 18 U.S.C. § 1961 (Sec. 1952), in violation of RICO, 18  
9 U.S.C. § 1961 & 1962(C) and as alleged in paragraphs 98 through 134 above.  
10

11 **129.** 18 U.S.C. § 1961 provides in pertinent parts:

12 (1). “racketeering activity” means (A) any act or threat involving murder,  
13 kidnapping, gambling, arson, robbery, bribery, extortion, dealing in obscene  
14 matter, or dealing in a controlled substance or listed chemical (as defined in  
15 section 102 of the Controlled Substances Act), which is chargeable under State  
16 law and punishable by imprisonment for more than one year; (B) any act which is  
17 indictable under any of the following provisions of title 18, United States Code:  
18 Section 201 (relating to bribery), section 1341 (relating to mail fraud), section  
19 1343 (relating to wire fraud), section 1344 (relating to financial institution fraud),  
20 section 1503 (relating to obstruction of justice), section 1512 (relating to  
21 tampering with a witness, victim, or an informant), section 1513 (relating to  
22 retaliating against a witness, victim, or an informant), section 1951 (relating to  
23 interference with commerce, robbery, or extortion), section 1952 (relating to  
24 racketeering), 1958 (relating to use of interstate commerce facilities in the  
25 commission of murder-for-hire), sections 175–178 (relating to biological  
26 weapons), sections 229–229F (relating to chemical weapons).  
27  
28

1 **130.** Specifically, at all relevant times herein, Defendant legislators and other  
2 Co-conspirators engaged in “racketeering activity” within the meaning of 18  
3 U.S.C. § 1961(1) by engaging in Obstruction of Justice in violation of 18 U.S.C.  
4 § 1503 by corruptly influencing the outcome of the house and senate hearings to  
5 pass bill SB277; and, Perjury of their Oaths to the California and U.S.  
6 Constitutions resulting in treason and Seditious Conspiracy to overthrow the state  
7 and federal Constitutions; and further engaged in a Conspiracy to Obstruct  
8 Justice in violation of 18 U.S.C. § 1951 relating to interference with commerce,  
9 robbery, or extortion; and, further engaged in a Conspiracy to Racketeer in  
10 violation of section 1951 of section 1961 and 1962(d).

11  
12 **131. Extortion of Plaintiffs’ Liberty-** A conviction for extortion within the  
13 meaning of the Hobbs Act requires that the Defendants obtained “property” or  
14 “liberty” from another, with his consent, induced by wrongful use of actual or  
15 threatened force, or fear, or under color of official right. 18 U.S.C. § 1503.

16  
17 **132.** In furtherance of their racketeering and extortion scheme, the Defendants  
18 have used their offices, positions, influence, affiliates and sub agencies including  
19 but not limited to the Superintendent of Schools, the County Health Departments,  
20 local law enforcement, Child Protective Services and health care providers to  
21 threaten, intimidate, coerce and or incarcerate Plaintiffs (the parents of  
22 unvaccinated or partially vaccinated offspring) for bogus criminal charges  
23 including, Parental Negligence, Child Endangerment, Truancy, etc. should they  
24 fail to comply with Defendants’ unconstitutional bill.

25  
26 **133.** The acts set forth above constitute a violation of one or more of the  
27 prohibited overt acts under 18 U.S.C. §1961 and 18 U.S.C. § 1962(c). All the  
28

1 Defendants and the other Co-conspirators each committed and/or aided and  
2 abetted the commission of two or more of these acts of racketeering activity.  
3

4 **134.** The acts of racketeering activity referred to in the previous paragraphs  
5 constituted a “pattern of racketeering activity” within the meaning of 18 U.S.C. §  
6 1961(5). The acts alleged were related to each other by virtue of common  
7 participates (all named Defendants), a common victim (Plaintiffs, Plaintiffs’  
8 offspring and others similarly situated), a common method of commission  
9 (closed door meetings and perjury of their oaths), and the common purpose and  
10 common result of extorting the constitutional rights of Plaintiffs and others  
11 similarly situated depriving said Plaintiffs or class of persons of equal protection  
12 of the laws or equal privileges and immunities under the law. The Defendant  
13 legislators and other Co-conspirators did commit the overt acts as alleged in this  
14 complaint in furtherance of conspiracy to the injury of Plaintiffs’ person or  
15 property and deprived Plaintiffs of Plaintiffs’ rights and or privileges as citizens  
16 of the united States America.  
17

18 **135.** The Obstruction of Justice and Extortion of Rights scheme being  
19 committed by the Defendants have continued for over two years and threatens to  
20 continue despite the institution of this Complaint.  
21

22 **136.** As a result of Defendants and the other Co-conspirators’ violations of 18  
23 U.S.C. § 1961 & 1962(c), Plaintiffs have lost a substantial amount of their time,  
24 money, labor and constitutional freedoms as a result of the racketeering activities  
25 conducted in the fraudulent bill passing scheme and as part of the prohibited  
26 activities herein alleged.  
27  
28

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

3  
4 **138.** Pursuant to RICO, 18 U.S.C. § 1964(c), Plaintiffs are entitled to recover  
5 threefold their damages plus costs from Defendants. The Defendants' acquisition,  
6 control and interest in this RICO enterprise were the proximate cause of damages  
7 and injury to Plaintiffs.

8  
9 **SECOND CLAIM FOR RELIEF FOR VIOLATION OF**  
10 **THE RACKETEERING INFLUENCED AND CORRUPT**  
11 **ORGANIZATIONS ACT ("RICO") 18 U.S.C. § 1962(a)(d), CONSPIRACY**  
12 **(By Plaintiffs Against All Defendants)**

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

15  
16 **140.** 18 U.S.C. § 1962(a) provides in relevant part: "It shall be unlawful for any  
17 person who has received any income derived, directly or indirectly, from a pattern  
18 of racketeering activity or .....to use or invest, directly or indirectly, any part  
19 of such income, or the proceeds of such income, in the acquisition of any interest  
20 in, or the establishment or operation of, any enterprise which is engaged in, or the  
21 activities of which affect, interstate or foreign commerce."

22  
23 **141.** 18 U.S.C. § 1962(d) provides in relevant part:  
24 It shall be unlawful for any person to conspire to violate any of the provisions of  
25 subsection (a), (b), or (c) of this section.

26  
27 **142.** Through the acquisition of the income derived from its open-ended pattern  
28 of racketeering activity, Defendants not only invest in an ever-expanding drug

1 companies which also funds Defendants' criminal enterprise with kickbacks in  
2 the form of campaign contributions and other known and unknown perks.  
3 Defendants also use the funds for government lobbying purposes to influence  
4 local and state legislation which has a direct effect on both interstate and foreign  
5 commerce in direct violation of 18 U.S.C. § 1962(a) and Section 1961.  
6

7 **143.** At all relevant times herein, Defendants and the Conspirators were each a  
8 "person" within the meaning of RICO, 18 U.S.C. §§ 1961(3) and 1962(d).  
9

10 **144.** At all relevant times herein, Defendants and the Co-conspirators formed an  
11 association-in-fact for the specific purpose of obstructing justice and extorting the  
12 constitutional rights of Plaintiffs and others similarly situated. This association-in-  
13 fact was an "enterprise" within the meaning of RICO, 18 U.S.C. § 1961(4).  
14

15 **145.** At all times relevant herein, this enterprise was engaged in, and its activities  
16 affected, interstate and foreign commerce, within the meaning of RICO, 18 U.S.C.  
17 § 1962(c).  
18

19 **146.** As set forth in Plaintiffs' First Claim For Relief, Defendants and each of the  
20 Co-conspirators associated with this enterprise conducted or participated, directly  
21 or indirectly, in the conduct of the enterprise's affairs through a "pattern of  
22 racketeering activity" within the meaning of RICO, 18 U.S.C. § 1961(5), in  
23 violation of RICO, 18 U.S.C. § 1962(c ).  
24

25 **147.** At all relevant times herein, Defendants and the other Co-conspirators each  
26 were associated with the enterprise and agreed and conspired to violate 18 U.S.C. §  
27 1962( c), that is, agreed to conduct and participate, directly or indirectly, in the  
28



1 conduct of the affairs of the enterprise through a pattern of activity, in violation of  
2 18 U.S.C. § 1962(d).

3  
4 **148.** Defendants and other Co-conspirators committed and caused to be  
5 committed a series of overt acts in furtherance of the conspiracy and to affect the  
6 objects thereof, including but not limited to the acts set forth above. “A defendant  
7 can be guilty of [violation of Section 1962(d) for] conspiring to violate a law  
8 [Section 1962(c)], even if he is not among the class of persons who could commit  
9 the crime directly.”) (emphasis added) abrogated on other grounds by *Salinas v.*  
10 *United States*, 522 U.S. 52 (1997). A conspiracy may exist even if a conspirator  
11 does not agree to commit or facilitate each and every part of the substantive  
12 offense. See *United States v. Socony-Vacuum Oil Co.*, 310 U.S. 150, 253-254  
13 (1940). The partners in the criminal plan must agree to pursue the same criminal  
14 objective and may divide up the work, yet each is responsible for the acts of each  
15 other. See *Pinkerton v. United States*, 328 U.S. 640, 646 (1946) (“And so long as  
16 the partnership in crime continues, the partners act for each other in carrying it  
17 forward”). If conspirators have a plan which calls for some conspirators to  
18 perpetrate the crime and others to provide support, the supporters are as guilty as  
19 the perpetrators. As Justice Holmes observed: “[P]lainly a person may conspire for  
20 the commission of a crime by a third person.” *United States v. Holte*, 236 U.S. 140,  
21 144 (1915).

22  
23 **149.** As a result of Defendants and the other Co-conspirators’ violations of 18  
24 U.S.C. § 1962(d), the Plaintiffs have lost hundreds of dollars in: petitioning the  
25 Defendants to not violate their rights, travel to and from the state capitol in  
26 Sacramento for the same purpose, which was to halt the criminal schemes  
27 Defendants created, organized, promoted, enacted and continue to operate and run.

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

3  
4 **151.** Pursuant to RICO, 18 U.S.C. § 1964(c), the Plaintiffs are entitled to recover  
5 threefold their damages plus costs from Defendants.

6  
7 **152.** Plaintiffs have been injured in their business and property in accordance  
8 with U.S.C. § 1962(a)(c)(d) as a direct and proximate result of the racketeering  
9 activities of Defendants, and each of them, in that the Defendants' criminal  
10 legislative acts were directed at Plaintiffs, Plaintiffs' offspring, and others  
11 similarly situated.

12  
13 **153.** Defendants' criminal enterprise have caused Plaintiffs to conduct legal  
14 research and incur court filing fees in federal court, and have caused Plaintiffs  
15 emotional distress, fear, anxiety and lack of sleep in having to defend themselves  
16 from Defendants' unlawful criminal activities.

17  
18 **154.** The exact amount of Plaintiffs' economic damages incurred as a direct and  
19 proximate result of Defendants' conduct is unknown at this time. Plaintiffs will  
20 seek leave of Court to amend this Complaint to set forth the exact amount thereof  
21 when the same is ascertained.

22  
23 **155.** As a direct and proximate result of the acquisition, maintenance, interest,  
24 control and income derived from the racketeering activities of the Defendants,  
25 and each of them, as described herein, Plaintiffs have suffered injuries to  
26 Plaintiffs' persons and property, and are entitled to recover treble damages for the  
27 injuries they have sustained, according to proof, as well as costs of suit and  
28 reasonable attorneys' fees, pursuant to 18 U.S.C. § 1964(c).

1  
2 **156.** As a direct and proximate result of the racketeering activities of the  
3 Defendants, and each of them, as described herein, Plaintiffs are entitled to an  
4 Order, pursuant to 18 U.S.C. § 1964(a), enjoining and prohibiting the  
5 Defendants, and each of them, from further engaging in the same conduct as the  
6 enterprise has engaged in.

7  
8 **THIRD CLAIM FOR RELIEF FOR VIOLATION OF 18 U.S.C. § 175,**  
9 **CHAPTER 10- CONSPIRACY TO PROMOTE THE SALE AND USE OF**  
10 **BIOLOGICAL WEAPONS ON CALIFORNIA CITIZENS**  
11 **(By Plaintiffs Against All Defendant Legislators)**

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

14  
15 **158. Sec. 175 - Prohibitions with respect to biological weapons.**

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

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

27 (c) Definition.—For purposes of this section, the term “for use as a weapon”  
28 includes the development, production, transfer, acquisition, retention, or possession

1 of any biological agent, toxin, or delivery system for other than prophylactic,  
2 protective, bona fide research, or other peaceful purposes.

3  
4 **159.** The Defendants are well aware of the fact that all of the CDC scheduled  
5 vaccines are riddled with heavy metals (aluminum, formaldehyde, mercury, human  
6 DNA cells, etc.), neurotoxins and deadly Retroviruses according to Dr. Judy  
7 Mikovits, an ex-government scientist, PhD in Bio Chemistry and Molecular  
8 Biology. These chemical compounds administered as “vaccines” do not cure  
9 diseases but causes diseases including Autism, Chronic Fatigue Syndrome, HIV,  
10 Cancer and life threatening allergies.

11 [https://www.youtube.com/watch?v=KUtIO\\_h1fRA](https://www.youtube.com/watch?v=KUtIO_h1fRA)

12 **160.** All the Defendant legislators have knowledge of these toxins and risks of  
13 exposure to the Plaintiffs and Plaintiffs’ offspring. The vaccine ingredients qualify  
14 as biological weapons within the meaning of Section 175(c). Section 175(a)  
15 provides: “Whoever knowingly assists a foreign state or any organization to do so,  
16 or attempts, threatens, or conspires to do the same, shall be fined under this title or  
17 imprisoned for life or any term of years, or both”. Defendant legislators have  
18 conspired with and have been bribed by the pharmaceutical companies to be the  
19 promoters of these toxic poisons to force them upon the citizenry for their own  
20 profit and gain and more specifically as alleged in Plaintiffs’ First and Second  
21 claims for relief in violation of Section 175 – Conspiracy to promote and force  
22 inject Plaintiffs’ offspring with these biological weapons with the specific intent to  
23 injure, maim and or kill the subject individual. As alleged herein above,  
24 Defendants have conspired to violated Section 175 Ch. 10 of U.S.C. Title 18 and is  
25 therefore liable to Plaintiffs under 18 U.S.C. 1964(a) & (c).  
26  
27  
28

1        **FOURTH CLAIM FOR RELIEF FOR VIOLATION OF 18 U.S.C. § 178,**  
2        **CHAPTER 11B- CONSPIRACY TO PROMOTE THE SALE AND USE OF**  
3        **CHEMICAL WEAPONS ON CALIFORNIA CITIZENS**

4                                **(By Plaintiffs Against All Defendant Legislators)**

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

7  
8        **162. Chapter 11B-Section 229, Chemical Weapons:**

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

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

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

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

18        **164.** Defendant legislators have assisted the drug companies in a conspiracy to  
19        promote and assist their agents and affiliates (the Superintendent of Schools, Child  
20        Protective Services, Local Law Enforcement Agencies, and Health Care  
21        Practitioners) in forcing these chemical weapons on Plaintiffs, Plaintiffs’ offspring  
22        and others similarly situated in violation of Section 229 of Chapter 11B, and as  
23        further alleged in Plaintiffs’ claims for relief in the First, Second and Third claims  
24        for relief. Defendant legislators and their Co-Conspirators qualify as domestic  
25        terrorists within the meaning of sections 229 and 175 of this title, and as such, their  
26        criminal conduct comes within the purview of the “RICO” laws. And as further  
27        alleged in the preceding paragraphs above, Defendants have violated Section 229  
28

1 of Ch. 11B of Title 18 of the U.S. Code and is therefore liable to Plaintiffs under  
2 18 U.S.C. 1964(a) & (c).

3  
4 **165.** Pursuant to the original Statutes at Large, the “RICO” laws itemized above  
5 are to be liberally construed by this honorable Court to effectuate its remedial  
6 purpose.

7  
8 **FIFTH CLAIM FOR RELIEF FOR VIOLATION OF 18 U.S.C. § 241**  
9 **(By Plaintiffs Against All Defendant Legislators)**

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

12  
13 **167. Title 18 U.S.C. § 241 provides in pertinent parts:**

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

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

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

23  
24 **168.** Defendant legislators and their Co-Conspirators through a pattern of  
25 racketeering activity, and as alleged in the paragraphs 98 through 174 above and as  
26 alleged in the 1<sup>st</sup>, 2<sup>nd</sup>, 3<sup>rd</sup>, and 4<sup>th</sup> claims for relief, in passing SB277 are in violation  
27 of 18 U.S.C. § 241 and are thereby liable to Plaintiffs under 18 U.S.C. § 1964(a) &  
28 (c).

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

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2  
3  
4 **169.** Plaintiffs reallege and incorporate in this Sixth Claim for Relief each and every allegation set forth above, as though fully set forth herein.  
5

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

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

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

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

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

25 **-Judicial Notice Requested-**

26 **The Law, The Court And All Proceedings Must Be in Accordance With The**  
27 **U.S. Constitution And The Common Law.**  
28

- 1 1. The assertion of federal rights, when plainly and reasonably made, is not to  
2 be defeated under the name of local practice. (Davis v. Wechsler, 263 US  
3 22, 24).
- 4 2. The constitution is to be interpreted according to common law rules. Schick  
5 v. U.S., 195 US 65, 24 Sup. Ct. 826, 49 L. Ed. 99.
- 6 3. Cohens v Virginia, 6 wheat (19 U.S.) 264, 404 (1821): Chief Justice John  
7 Marshall said "We [public servants] have no more right to decline the  
8 jurisdiction which is given, than to usurp that which is not given. The one or  
9 the other would be treason to the constitution."
- 10 4. Ramsey v. Allegrie, 25 U.S. (12 Wheaton) 611, 631 (1827): "If the common  
11 law can try the cause and give full redress, that alone takes away the  
12 admiralty jurisdiction."
- 13 5. Hayburn's Case. 2 Dali. (2 U.S.) 409 (1792); Article #6 Clauses 2 and 3,  
14 U.S. Constitution: "This Constitution is the supreme Law of the Land. All  
15 judicial officers of the united States are bound by oath or affirmation, to  
16 support this Constitution.
- 17 6. Boyd v. U.S., 116 U.S. 635 (1886): "Constitutional provisions for the  
18 security of person and property should be liberally construed. It is the duty  
19 of the courts to be watchful of constitutional rights against any stealthy  
20 encroachments thereon."
- 21 7. Norton v. Shelby County 118 USR 425 (1886): "An unconstitutional act is  
22 not law. It confers no rights, it imposes no duties, it affords no protections, it  
23 creates no office. It is in legal contemplation as inoperative as though it has  
24 never been passed."
- 25 8. Miranda v. Arizona 384 US 436 (1966): "Where rights secured by the  
26 constitution are involved, there can be no rule or law making or legislation  
27 which would abrogate or abolish them."
- 28



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

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

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

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

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

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

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

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

24  
25 **173.** At all times material herein, there was in full force and effect certain  
26 provisions of the Constitution of the United States, namely, U.S. Constitution  
27 Amendment 14, § 1 that states in pertinent part as follows:  
28

1 ... nor shall any State deprive any person of life, liberty, or property, without due  
2 process of law; nor deny to any person within its jurisdiction the equal protection  
3 of the laws.

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

8  
9 The right of the people to be secure in their persons, houses, papers, and effects,  
10 against unreasonable searches and seizures, shall not be violated, and no warrants  
11 shall issue, but upon probable cause, supported by oath or affirmation, and  
12 particularly describing the place to be searched, and the persons or things to be  
13 seized.

14  
15 **175.** At all times material herein, there was in full force and effect certain  
16 provisions of the Constitution of the United States, namely, U.S. Constitution  
17 Amendment 5, that states in pertinent part as follows:

18  
19 ... nor be deprived of life, liberty, or property, without due process of law; nor  
20 shall private property be taken for public use, without just compensation.

21  
22 **176.** At all times material herein, there was in full force and effect certain  
23 provisions of the Constitution of the United States, namely, U.S. Constitution  
24 Amendment 1, that states in pertinent part as follows:

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

1  
2 **177.** At all times material herein, there was also in full force and effect a certain  
3 statute of the United States known as the Civil Rights Act of 1871, 42 U.S.C.A. §  
4 1983, which provides, in pertinent part as follows:

5  
6 Every person who, under color of any statute, ordinance, regulation, custom, or  
7 usage, of any State or Territory or the District of Columbia, subjects, or causes to  
8 be subjected, any citizen of the United States or other person within the jurisdiction  
9 thereof to the deprivation of any rights, privileges, or immunities secured by the  
10 Constitution and laws shall be liable to the party injured in an action at law, suit in  
11 equity, or other proper proceeding for redress.

12  
13 **178.** At all times material herein, there was also in full force and effect a certain  
14 statute of the United States known as the Civil Rights Act of 1871, 42 U.S.C.A. §  
15 1986, which provides, in pertinent part as follows:

16  
17 Every person who, having knowledge that any of the wrongs conspired to be done,  
18 and mentioned in section 1985 of this title, are about to be committed, and having  
19 power to prevent or aid in preventing the commission of the same, neglects or  
20 refuses so to do, if such wrongful act be committed, shall be liable to the party  
21 injured, or his legal representatives, for all damages caused by such wrongful act,  
22 which such person by reasonable diligence could have prevented; and such  
23 damages may be recovered in an action on the case; and any number of persons  
24 guilty of such wrongful neglect or refusal may be joined as defendants in the  
25 action; and if the death of any party be caused by any such wrongful act and  
26 neglect, the legal representatives of the deceased shall have such action therefor,  
27 and may recover not exceeding \$5,000 damages therein, for the benefit of the  
28 widow of the deceased, if there be one, and if there be no widow, then for the

1 benefit of the next of kin of the deceased. But no action under the provisions of this  
2 section shall be sustained which is not commenced within one year after the cause  
3 of action has accrued.  
4

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

13 **180.** Defendant legislators have long established a policy, custom and usage of  
14 violating their oaths of office to pass unconstitutional laws directed at stripping the  
15 constitutional rights of Plaintiffs and others similarly situated.  
16

17 **Count 1**

18 **181.** The First Amendment to the U.S. Constitution secures Plaintiffs the right to  
19 religious or personal freedoms. In passing SB277 Plaintiffs' offspring would be  
20 barred from entering public schools unless and until they have complied with ALL  
21 the required CDC scheduled vaccinations. Plaintiffs and their offspring would be  
22 required to waive their rights under their deeply held spiritual beliefs and training  
23 to comply with SB277. Defendant legislators violated Plaintiffs' protected rights  
24 under the First Amendment to the U.S. Constitution and is therefore liable to  
25 Plaintiffs under 42 U.S.C. § 1983 and the common law.  
26

27 **Count 2**

28 **182.** Article 1 Section 4 of the California constitution guarantees Plaintiffs' the  
free exercise and enjoyment of religious freedom without discrimination or

1 preference. SB277 would preclude Plaintiffs and their offspring from invoking  
2 their rights of religious freedoms under California law to be in compliance with its  
3 mandate. In passing SB277 Defendant legislators have discriminated against  
4 Plaintiffs and their offspring with respect to Plaintiffs' protected rights under the  
5 First Amendment to the U.S. Constitution and Art. 1 Sec. 4 of the California  
6 constitution and is therefore liable to Plaintiffs under 42 U.S.C. § 1983 and the  
7 common law.

8 **Count 3**

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

14  
15 **184.** SB277 would preclude Plaintiffs and their offspring from invoking their  
16 rights of privacy with respect to the disclosure of their medical information to  
17 school officials. In turn the school officials would use this information for the sole  
18 purpose of reporting this information to the local law enforcement agencies and or  
19 Child Protective Services for initiating criminal prosecutions against Plaintiffs and  
20 other parents of partially or unvaccinated offspring. Plaintiffs and their offspring  
21 would be required to waive their rights of privacy and the right to be let alone  
22 under the Fourth Amendment in order to comply with SB277. Defendant  
23 legislators in enacting SB277 have violated Plaintiffs' protected rights under the  
24 Fourth Amendment to the U.S. Constitution and is therefore liable to Plaintiffs  
25 under 42 U.S.C. § 1983 and the common law.

26 **Count 4**

27 **185.** SB277 violates Plaintiffs and their offspring's rights under the Fifth  
28 Amendment to the U.S. constitution in that the unwanted injections of poisons into

1 their offspring is considered a felony assault with intent to do serious harm,  
2 including but not limited to maiming and or killing the individual. Under the Fifth  
3 Amendment, Plaintiffs and their offspring have the right not to be maimed, injured  
4 in their health or killed without due process of law.

5  
6 **186.** The right of self-defense and self-preservation is natural right long precedent  
7 to the U. S. Constitution.

8 Self-defense as stated by Justice Blackstone of “Blackstone’s Commentaries On  
9 English Common Law”:

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

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

1 **187.** Defendant legislators in enacting SB277 have violated Plaintiffs' protected  
2 rights under the Fifth Amendment to the U.S. Constitution and is therefore liable to  
3 Plaintiffs under 42 U.S.C. § 1983 and the common law.

4 **Count 5**

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

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

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

17  
18 **190.** 42 U.S.C.A. § 1986, which provides, in pertinent part as follows:  
19 Every person who, having knowledge that any of the wrongs conspired to be done,  
20 and mentioned in section 1985 of this title, are about to be committed, and having  
21 power to prevent or aid in preventing the commission of the same, neglects or  
22 refuses so to do, if such wrongful act be committed, shall be liable to the party  
23 injured, or his legal representatives, for all damages caused by such wrongful act,  
24 which such person by reasonable diligence could have prevented; and such  
25 damages may be recovered in an action on the case; and any number of persons  
26 guilty of such wrongful neglect or refusal may be joined as defendants in the  
27 action;  
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**Count 6**

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

**Count 7**

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

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

**193.** The mandatory requirement that Plaintiffs and their offspring comply with an unlawful tyrannical law puts Plaintiffs and others similarly situated in a perpetual state of civil enslavement at the whims of Defendant State of California and its agencies in violation of the 13<sup>th</sup> Amendment to the U.S. constitution. The passage of SB277 violates Plaintiffs' and their offspring's rights constitutionally, and thus Defendants are liable to Plaintiffs under 42 U.S.C. § 1983.



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

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

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

**PRAYER FOR RELIEF**

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

**ON THE FIRST CLAIM FOR RELIEF**

1. For treble the amount of actual damages in an amount to be determined according to proof at trial;
2. For reasonable attorneys' fees pursuant to 18 U.S.C. § 1964(c);
3. 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 SECOND CLAIM FOR RELIEF**

4. For treble the amount of actual damages in an amount to be determined according to proof at trial;

- 1 5. For reasonable attorneys' fees pursuant to 18 U.S.C. § 1964(c);
- 2 6. For an Order enjoining and prohibiting Defendants, and each of them, from
- 3 further engaging in the racketeering conduct as described in this Complaint;
- 4

5 **ON THE THIRD CLAIM FOR RELIEF**

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

12 **ON THE FOURTH CLAIM FOR RELIEF**

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

19 **ON ALL CLAIMS FOR RELIEF**

- 20 13. For restitution to all Plaintiffs in an amount \$25,000 against each Defendant
- 21 on each claim for relief and each count;
- 22 14. For a temporary, preliminary and permanent injunction, pursuant to 28
- 23 U.S.C. Section 2201, enjoining and restraining Defendant legislators and the
- 24 Defendant State of California, its employees, servants, agents, affiliates,
- 25 distributors, dealers, members, attorneys, successors and/or assigns, and all
- 26 persons in active concert or participation with any of them, in enforcing
- 27 SB277 on Plaintiffs, Plaintiffs' offspring;
- 28 15. For a declaratory Order that SB277 is void for want of lawful enactment due

1 to its repugnance to the First, Fourth, Fifth, Ninth, and Fourteenth  
2 Amendments to the united States Constitution;

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

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

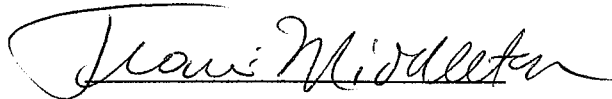
8 18. That all issues so triable be tried to a 7<sup>th</sup> Amendment jury at common law;

9 19. For costs of suit incurred herein; and

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

11  
12 Dated: August 2, 2016

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15  
16 Respectfully Submitted,



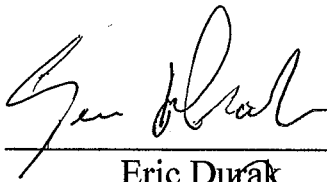
17 Travis Middleton  
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19 Santa Barbara, California 93101  
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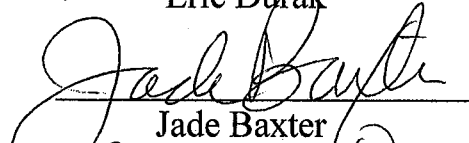
**VERIFICATION**

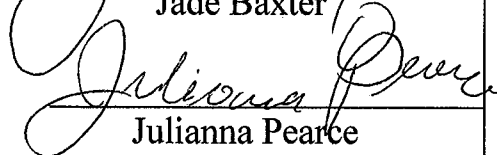
We, Travis Middleton, Eric Durak, Jade Baxter, Julianna Pearce, Candace Estave, Denise Michele Derusha, Melissa Christou, Andrea Lewis, Rachil Vincent, Jackie Kozak, Don Demanlevesde, Jessica Haas, Paige Murphy, Christie Macias, Lori Strantz, Anwanur Gielow, Lisa Ostendorf, Julia Anne Whitney, Pam Corner, Jodie Tisserand, Andy Taff, Alice Tropper, Bret Nielsen, Brent Haas, Muriel 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.

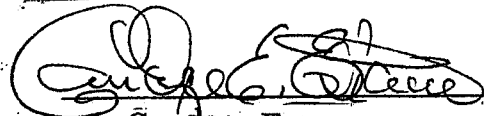
Dated this 2<sup>nd</sup> day of August, 2016

  
Eric Durak

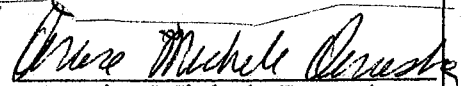
  
Jade Baxter

  
Julianna Pearce

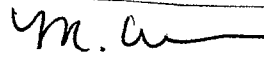
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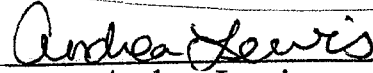
Candyce Estave



Denise Michele Derusha



Melissa Christou



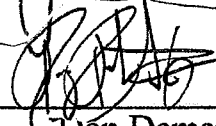
Andrea Lewis



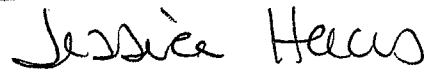
Rachil Vincent



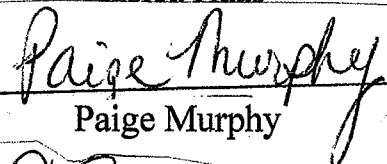
Jackie Kozak



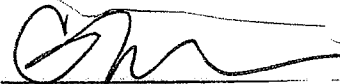
Don Demanlevesde



Jessica Haas



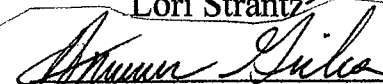
Paige Murphy



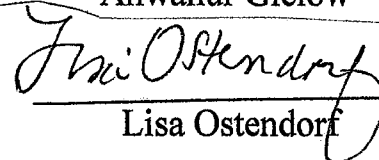
Christie Macias



Lori Strantz

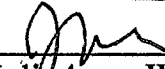


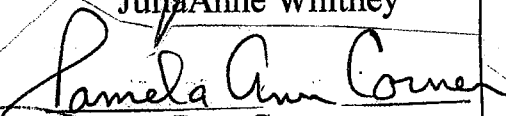
Anwanur Gielow

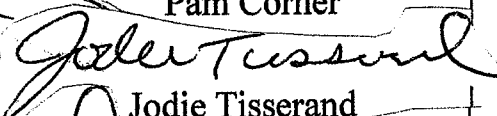


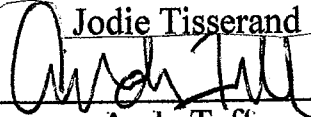
Lisa Ostendorf

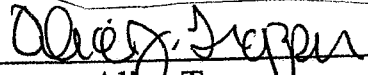
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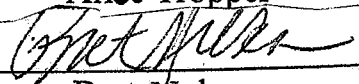
  
Julia Anne Whitney

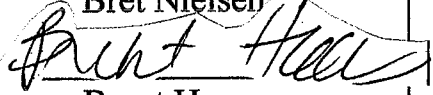
  
Pam Corner

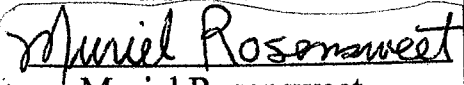
  
Jodie Tisserand

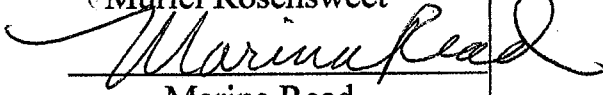
  
Andy Taff

  
Alice Tropper

  
Bret Nielsen

  
Brent Haas

  
Muriel Rosensweet

  
Marina Read

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**EXHIBIT A**



OFFICE OF THE GOVERNOR

June 30, 2015

To the Members of the California State Senate:

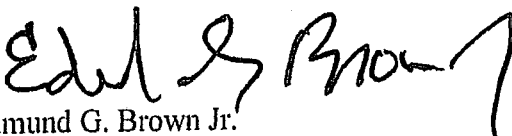
SB 277 has occasioned widespread interest and controversy – with both proponents and opponents expressing their positions with eloquence and sincerity. After carefully reviewing the materials and arguments that have been presented, I have decided to sign this bill.

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,

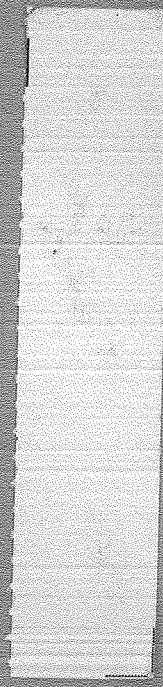
  
Edmund G. Brown Jr.



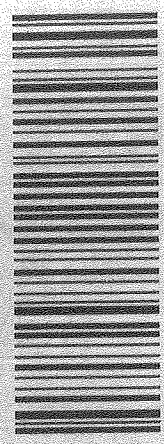
*Travis Michael Weber*

*416 27 West Amphipam Ln #153*

*Santa Barbara, California Republic CA 93102*



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*Marina Pogossyan, Court Clerk  
United States District Court,  
Central District of California, Western  
312 North Spring Street Rm G-8  
Los Angeles, CA 90012*