

1 Travis Middleton  
2 27 West Anapamu Street No. 153  
3 Santa Barbara, California 93101  
4 Travis\_m\_93101@yahoo.com  
5 (805) 284-6562  
6 "Private Attorney General" Ex Rel.

7  
8 UNITED STATES DISTRICT COURT  
9 CENTRAL DISTRICT OF CALIFORNIA  
10 WESTERN DIVISION

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

24 Plaintiffs,

25 vs.

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

Incorporated Case No.:

VERIFIED COMPLAINT FOR:

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

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

42 U.S.C. §§ 1983 & 1986

COMMON LAW JURISDICTION  
UCC 1-103.6

DEMAND FOR JURY TRIAL  
REQUEST LEAVE TO AMEND

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

11 Defendants.

12 *(Defendant Legislators are sued in their*  
13 *individual & official capacities)*

14  
15 **COMPLAINT**

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

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

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

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

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

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

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

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

13  
14 **STATEMENT OF THE CASE**

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

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

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

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

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

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

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

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

4 **Aluminum hydroxide & aluminum phosphate:**

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

12 According to the FDA, Aluminum may reach toxic levels with prolonged  
13 parenteral feeding . . . Research indicates that patients with impaired kidney  
14 function, including premature neonates [babies], who received parenteral levels  
15 of aluminum at greater than 4 to 5 micrograms per kilogram of body weight per  
16 day, accumulate aluminum at levels associated with central nervous system and  
17 bone toxicity. Tissue loading may occur at even lower rates of administration.”  
18 Also, according to government documents, “Aluminum content in parenteral  
19 drug products could result in a toxic accumulation of aluminum in individuals  
20 receiving TPN therapy. Research indicates that neonates and patient populations  
21 with impaired kidney function may be at high risk of exposure to unsafe amounts  
22 of aluminum. Studies show that aluminum may accumulate in the bone, urine,  
23 and plasma of infants receiving TPN. Many drug products used in parenteral  
24 therapy may contain levels of aluminum sufficiently high to cause clinical  
25 manifestations . . . parenteral aluminum bypasses . . . the protective mechanism of the  
26 GI tract and aluminum circulates and is deposited in human tissues. Aluminum  
27 toxicity is difficult to identify in infants because few reliable techniques are  
28 available to evaluate bone metabolism in . . . infants . . . Although aluminum

1 toxicity is not commonly detected clinically, it can be serious in selected patient  
2 populations, such as neonates, and may be more common than is recognized.

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

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

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

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

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



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

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

12 **Formaldehyde (embalming fluid):**

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

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

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

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

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

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

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

## 21 **Mercury Thimerosal**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

1. This action arises under the provisions of the Racketeering Influenced and Corrupt Organizations Act, Title 18 U.S.C. §§ 1961- 1964.

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

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

3. 28 U.S.C. §§ 1343 and the First Amendment to the United States Constitution which provides for a *federal court forum* in which citizens may seek regress from the deprivation of rights, privileges, and immunities under color of state law.

4. 28 U.S.C. § 1331, the general federal question statute. 28 U.S.C. § 2201 and § 2202, the federal declaratory relief and injunctive relief statutes, to declare the rights of the parties.

5. 28 U.S.C. § 1332 (a)(1), diversity of jurisdiction of citizens of different states and the amount of controversy exceeds \$75,000.00.

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

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

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

### 15 VENUE

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

### 21 PARTIES

#### 22 **Plaintiffs**

23 10. Plaintiff Travis Middleton, Private Attorney General ex rel, is a private  
24 citizen residing in the State of California at 27 West Anapamu Street No. 153  
25 Santa Barbara, California 93101, and appears on behalf of *others similarly*  
26 *situated* throughout the California area.  
27  
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- 1 11. Plaintiff Eric Durak is a private citizen residing in the State of California at  
2 133 Campo Vista Drive Santa Barbara, California 93111.
- 3 12. Plaintiff Jade Baxter is a private citizen residing in the State of California at  
4 207 West Victoria Street Santa Barbara, California 93101.
- 5 13. Plaintiff Julianna Pearce is a private citizen residing in the State of  
6 California at 28780 My Way, Oneals, California 93645.
- 7 14. Plaintiff Candyce Estaves is a private citizen with a vaccine injured  
8 Son and daughter residing in the State of California at 430 East Rose  
9 Avenue Santa Maria California 93454.
- 10 15. Plaintiff Denise Michelle Derusha is a private citizen residing in the State of  
11 California at 291 South Oakglen Avenue Nipomo, California 93444.
- 12 16. Plaintiff Melissa Christou is a private citizen residing in the State of  
13 California at 1522 knoll Circle Drive Santa Barbara, California 93101.
- 14 17. Plaintiff Andrea Lewis is a private citizen residing in the State of California  
15 at 1331 Santa Barbara St. # 10, Santa Barbra, California 93101.
- 16 18. Plaintiff Rachil Vincent is a private citizen residing in the State of California  
17 at 4320 Viua Presada, Santa Barbara, California 93110.
- 18 19. Plaintiff Jackie Kozak is a private citizen residing in the State of California at  
19 1573 Lyndhivist Ave Camarillo, California 93010.
- 20 20. Plaintiff Don Demanlevesde is a private citizen residing in the State of  
21 California at 618 West Ortega Santa Barbara, California 93111.
- 22 21. Plaintiff Jessica Haas is a private citizen residing in the State of California at  
23 2715 Verde Vista Santa Barbara, California 93105.
- 24 22. Plaintiff Paige Murphy is a private citizen residing in the State of California  
25 at 2230 Memory Lane West Lake Village, California 91361.
- 26 23. Plaintiff Christie Macias is a private citizen residing in the State of California  
27 at 618 West Ortega Santa Barbara, California 93101.
- 28 24. Plaintiff Lori Strantz is a private citizen residing in the State of California at



1 120 Barranca #B Santa Barbara, California 93109.

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

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

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

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

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

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

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

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

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

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

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

24  
25 **Defendants**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

3  
4 **94.** If the other news sources are correct in that this person was from another  
5 country, how and why does this fact even remotely suggest that American parents  
6 who chose not to vaccinate “their” children (which according to California Health  
7 officials make up only 2.5% of the populace), are somehow responsible for this so-  
8 called outbreak? Such a claim is dubious at best. There is no plausible scientific or  
9 other kind of evidence to support this nonsensical view. According to the CDC,  
10 *“Measles can be prevented with the MMR (measles, mumps, and rubella) vaccine.*  
11 *One dose of MMR vaccine is about 93% effective at preventing measles if exposed*  
12 *to the virus, and two doses are about 97% effective. In the United States,*  
13 *widespread use of measles vaccine has led to a greater than 99% reduction in*  
14 *measles cases compared with the pre-vaccine era. Since 2000, when measles was*  
15 *declared eliminated from the U.S., the annual number of people reported to have*  
16 *measles ranged from a low of 37 people in 2004 to a high of 668 people in 2014.*  
17 *Most of these originated outside the country or were linked to a case that*  
18 *originated outside the country”.*  
19  
20  
21

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

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

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

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

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

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

7 [http://www.latimes.com/science/sciencenow/la-sci-sn-disneyland-measles-under-](http://www.latimes.com/science/sciencenow/la-sci-sn-disneyland-measles-under-vaccination-20150316-story.html)  
8 [vaccination-20150316-story.html](http://www.latimes.com/science/sciencenow/la-sci-sn-disneyland-measles-under-vaccination-20150316-story.html). But this was in the Philippines, not the U.S.

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

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

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

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

9  
10 **101.** In view of these severe discrepancies and falsehoods in the official reports of  
11 this Disneyland measles event, one could conclude that the whole event is a hoax  
12 on a grand scale and that the Defendants and their P.R. people should learn to lie  
13 better.  
14

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

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

25  
26 **103.** According to an article from 2014 in the Sacramento Bee:  
27 “As a UC Davis pediatrician, Pan was an active member of the group that lobbies  
28 for doctors in the Capitol, known as the California Medical Association. Jodi Hicks

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

6  
7 **104.** Hicks daughter, Seneca, appeared in Defendant Pan's campaign  
8 commercials. Hicks said about her daughter Seneca appearing in Defendant Pan's  
9 campaign commercials, "I don't think anyone other than a few of us here in  
10 Sacramento know it's a lobbyist's daughter." Interestingly enough, Jodi Hicks now  
11 works for DiMare, Brown, Hicks & Kessler, LLC (DBHK) and was named Capitol  
12 Weekly's "Top 100", an annual ranking of the most powerful players in California  
13 politics. It is my opinion that Ms. Hicks is near the top of a dubious, stinking pile  
14 of corruption.

15  
16 **105.** Defendants Pan, Allen and Gonzalez then colluded and conspired with Jodi  
17 Hicks and other lobbyist to encourage the other Defendant legislators through  
18 monetary compensation to join in, support and pass SB277.

19  
20  
21 **106. TOP DRUG MAKER DONORS**

22  
23 State records show that pharmaceutical companies and trade groups donated more  
24 than \$2 million to current lawmakers in 2013-2014.

25

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

26  
27  
28



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

**TOP DRUG MAKER RECIPIENTS**

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

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

14 \*Member of the Assembly or Senate health committees

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

9  
10 *-Huffington Post.*

11  
12 **111.** The Defendants Pan, Allen, Gonzalez and the other Defendant legislators  
13 knew before hand of these lawsuits and were aware of the harmful heavy metals  
14 inside these vaccines long before the house and senate hearings on SB277. The  
15 Defendant legislators were at this point already paid off by the lobbyist from the  
16 pharmaceutical cartels and did not care about their lawful duty to do the right thing  
17 under the law as required by their oaths.

18  
19 **Defendants' Ongoing, Open-Ended Pattern of Racketeering Activity**

20  
21 **112.** On information and belief, in furtherance of their racketeering scheme the  
22 Defendant legislators routinely engaged in unlawful service and duties to their  
23 offices and to the citizens they purport to represent by accepting bribes in the form  
24 of money and other considerations from drug company lobbyists to pass legislation  
25 that extorts the rights of the citizens of California for the Defendants' own  
26 financial gain and profit. For purposes of this section, generic description of  
27 "bribery" is conduct which is intended, at least by the alleged briber, as an assault  
28

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

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

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

21  
22 **115.** On information and belief, in furtherance of their racketeering scheme  
23 Defendant legislators routinely collude and conspire with one another to use the  
24 house and senate hearings at the state capital as their conduit and venue to extort  
25 the liberty and certain rights of Plaintiffs and other California citizens of their  
26 property, money and liberty by sham, oppressive legislation like SB277 and other  
27 similar bills.  
28

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

1 of such income, or the proceeds of such income, in the acquisition of any interest  
2 in, or the establishment or operation of, any enterprise which is engaged in, or the  
3 activities of which affect, interstate or foreign commerce."  
4

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

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

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

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

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

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

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



1 **146.** As set forth in Plaintiffs' First Claim For Relief, Defendants and each of the  
2 Co-conspirators associated with this enterprise conducted or participated, directly  
3 or indirectly, in the conduct of the enterprise's affairs through a "pattern of  
4 racketeering activity" within the meaning of RICO, 18 U.S.C. § 1961(5), in  
5 violation of RICO, 18 U.S.C. § 1962(c ).  
6

7 **147.** At all relevant times herein, Defendants and the other Co-conspirators each  
8 were associated with the enterprise and agreed and conspired to violate 18 U.S.C. §  
9 1962( c), that is, agreed to conduct and participate, directly or indirectly, in the  
10 conduct of the affairs of the enterprise through a pattern of activity, in violation of  
11 18 U.S.C. § 1962(d).  
12

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

19  
20 **171.** Defendant legislators and their Co-Conspirators through a pattern of  
21 racketeering activity, and as alleged in the paragraphs 98 through 177 above and as  
22 alleged in the 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  
23 violation of 18 U.S.C. § 242 and are thereby liable to Plaintiffs under 18 U.S.C. §  
24 1964(a) & (c).

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

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

3 **-Judicial Notice Requested-**

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

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



- 1 8. *Miranda v. Arizona* 384 US 436 (1966): “Where rights secured by the  
2 constitution are involved, there can be no rule or law making or legislation  
3 which would abrogate or abolish them.”
- 4 9. "A legislative act contrary to the Constitution is not law." *Carter v. Carter*  
5 *Coal Co.*, 298 U.S. 238.
- 6 10. "All laws which are repugnant to the Constitution are null and void."  
7 *Marbury v. Madison*, 5 U.S. 137,174,176.
- 8 11. "The claim and exercise of a Constitutional Right cannot be converted into  
9 a crime." *Miller v. US.*, 230 F, 2d 286,489.
- 10 12. "The mere chilling of a Constitutional right by a penalty on its exercise is  
11 patently unconstitutional." *Shapiro v. Thompson*, 394 U.S. 618. A law that  
12 "impinges upon a fundamental right explicitly or implicitly secured by the  
13 Constitution is presumptively unconstitutional." *Mobile v. Bolden*, 446 US  
14 55, 76; *Harris v. McRae*, 448 US 297,312.
- 15 13. A law that improperly infringes on Constitutional Rights is void from its  
16 inception and no person can be obligated to obey such a law. 16A ArnJur2d  
17 Constitutional Law, Section 203.
- 18 14. SB277 as amended and applied is wholly unconstitutional for the above  
19 stated lawful case law precedents.
- 20 15. Plaintiffs assert that SB277 and any statutory laws or state codes related  
21 thereto are not applicable, and Plaintiffs are exempt from jurisdiction of said  
22 codes except and unless said codes or statutory laws can be proven to be in  
23 harmony with the U.S. Constitution and the common law (UCC 1-103.6).
- 24
- 25 **172.** Plaintiffs reallege and incorporate in this Seventh Claim for Relief each and  
26 every allegation set forth above, as though fully set forth herein.
- 27
- 28

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

20  
21 **Count 1**

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

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

3 **Count 2**

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

13 **Count 3**

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

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

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

3 **Count 4**

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

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

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

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

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

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

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

8 **Count 5**

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

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

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

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

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

#### 4 **Count 6**

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

#### 14 **Count 7**

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

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

23  
24  
25 **193.** The mandatory requirement that Plaintiffs and their offspring comply with  
26 an unlawful tyrannical law puts Plaintiffs and others similarly situated in a  
27 perpetual state of civil enslavement at the whims of Defendant State of California  
28 and its agencies in violation of the 13<sup>th</sup> Amendment to the U.S. constitution. The



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

3  
4 **NINTH CLAIM FOR RELIEF FOR INTENTIONAL INFLICTION OF**  
5 **EMOTIOANAL DISTRESS**

6 **(By Plaintiffs Against All Defendants)**

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

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

17 **PRAYER FOR RELIEF**

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

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

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



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

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

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

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

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

13 19. For costs of suit incurred herein; and

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

15  
16 Dated: May 29, 2016

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19  
20 Respectfully Submitted,

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

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

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

Dated this 29th day of May, 2016

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Eric Durak

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Jade Baxter

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Julianna Pearce

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Candace Estave

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Denise Michelle Derusha

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Melissa Christian

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Andrea Lewis

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Rachil Vincent

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Erin Muslera

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Laura Goycocher

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Erick Goycocher

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Jackie Kozak

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Don Demanlevesde

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Jessica Haas

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Paige Murphy

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Christie Macias

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Carol Dorman

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Lori Strantz

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Anwanur Gielow

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Lisa Ostendorf

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Monica Eckert

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Audra Escalante

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JuliaAnne Whitney

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Pam Corner

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Doug Weber

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Jodie Trsserand

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Andy Taff

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Shannon Cushman

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Alice Tropper

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Cadela T. Araktan

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Bret Nielsen

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Brent Haas

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Murid Rosensweet

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Eliza Mosses

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Marc D. Grandle

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Marina Read

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**VERIFICATION**

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

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

Dated this 29th day of May, 2016

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Travis Middleton  
Private Attorney General, ex rel.



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# **EXHIBIT A**