

## CRIMINAL COMPLAINT

### Case No.

Filed at: Office of Texas Attorney General Ken Paxton

Date filed: 17 January 2022

Filed by: Jack E. Boteler  
538 Surf Oaks Drive  
Seabrook, TX 77586

I, Jack E. Boteler, a citizen of Seabrook, Harris County, Texas and resident of same together with all interested parties and subscribed citizens and residents of the United States of America who received any Emergency Use Authorization investigational injection of genetic biologic material (mRNA or adenoviral DNA) coding for the Wuhan spike protein known to be the pathogenic structure of SARS-CoV-2 designed to provoke the human body to produce antibodies for Covid 19, commonly referred to as the "Covid 19 vaccines," along with all persons living with, near or adjacent to any such person or persons in this county or State (hereinafter the "**Complainants**").

V.

Any and all officers and/or directors of the U.S. Department of Health and Human Services ("HHS") and affiliates: Food and Drug Administration ("FDA"), National Institutes of Health ("NIH"), National Institute of Allergy and Infectious Diseases ("NIAID"), Centers for Disease Control and Prevention ("CDC"), Center for Medicare and Medicaid Services (CMS), all of the aforementioned hereinafter referred to as "establishment officials"; Dr. Ralph Baric and the Board of Regents at the University of North Carolina Chappell Hill; Director General Tedros Adhanom Ghebreyesus of the World Health Organization ("WHO"); Dr. Anthony Fauci; Dr. Francis Collins; Dr. Rick Bright; Dr. Janet Woodcock, Dr. Peter Daszak; Mr. William Gates Junior; Mr. Theodore ("Ted") Turner; Mr. Eli Broad; Mr. George Soros; Dr. Deborah Birx; Mr. Richard A. Rothschild; any Director or Officer of Moderna Inc.; any Director or Officer of Pfizer, Inc.; any Director or Officer of Johnson & Johnson Services, Inc.; any Director or Officer of Astra Zeneca Plc.; any Director or Officer of the Pirbright Institute; any Director or Officer of Johns Hopkins Bloomberg School of Public Health; any Director or Officer of the World Economic Forum; any Director or Officer of the Bill & Melinda Gates Foundation; any Director or Officer of the World Bank; any Director or Officer of the International Monetary Fund ("IMF"); and any other person, governmental, or non-governmental organization, incorporated or not, including U.S. and international media outlets that / who knowingly aided and abetted the denial or restriction of access to therapeutic treatments for the Sars-CoV-2 virus and / or promoted or distributed Emergency Use Authorization (EUA) experimental gene therapy injections commonly referred to as "Covid 19 Vaccines" (collectively, the "**Defendants**")

## **CRIMINAL COMPLAINT**

- **JURISDICTION & STATUTORY AUTHORITY**
- **THEORY OF THE CASE**
- **FACTUAL ALLEGATIONS – VIRUS ORIGINS**
- **FACTUAL ALLEGATIONS – VACCINE DEVELOPMENT & PROMOTION**
- **FACTUAL ALLEGATIONS – HOSPITALIZATIONS & CENSORED THERAPEUTICS & PHYSICIAN PEROGATIVES**
- **FACTUAL ALLEGATIONS – POST VACCINATION REACTIONS & DEATHS**
- **IN RELATION TO DEFENDANT VACCINE MANUFACTURERS: THEIR TRIALS, OFFICERS, DIRECTORS & CONSPIRATORS**
- **PUBLICLY AVAILABLE OPINIONS of MEDICAL DOCTORS and BIO-SCIENTISTS**
- **CONCLUSION**

### **JURISDICTION & STATUTORY AUTHORITY**

1. This Criminal Complaint contemplates numerous defendants some of which are corporate, trusts, affiliations, governmental and non-governmental entities; each such legal or natural person has minimum contacts in this state and/or county and legal status or representation to effectuate assertion of jurisdiction of the State of Texas Attorney General in order to investigate, prosecute and try these defendants pursuant to the legal authority and jurisdiction(s) below sequenced:
  - a) At all material times as alleged herein one or more defendants was either physically present in this jurisdiction, had an “agent” (as defined in 22 U.S. Code § 611) resident in this jurisdiction, had a Permanent Establishment (supra) in this jurisdiction or committed acts for which local minimum contacts standards for application of jurisdiction are waived by statute, convention, common or international law.
  - b) For the preponderance of Crimes alleged and exhibited herein, there is no Statute of Limitations and state law allows for the assertion of jurisdiction over the subject matter where reasonable and compelling facts are present, 212 F.3d 885 (5thCir. 2000) et seq.
  - c) Crimes alleged herein provide minimum contacts for equivalent state and federal crimes pursuant to 18 U.S.C. § 3235 & supplemental jurisdiction under 28 U.S.C. 1367 (1994).
  - d) Criminal cases, where compelling state interests are at issue, provide state, sovereign or local jurisdiction. See *Holt v. Hobbs*, 574 U.S. 352 (2015).

- e) This complaint is brought pursuant to 50 U.S.C. § 2441 et seq. under the **Universal Jurisdiction** provisions, which allow “any State” or instrumentality thereof to prosecute **Crimes Against Humanity**;
- f) Jurisdiction and venue are also proper under 18 USC §175 et Seq. in relation to **Prohibitions with Respect to Biological Weapons**;
- g) Universal jurisdiction (State, County, City and Federal) is provided by 18 USC § 1091(e) in relation to **Genocide**;
- h) Universal and local jurisdiction is provided by Articles 3, 4 & 5 of the Convention on the Non-Applicability of Statutory Limitations to **War Crimes** and **Crimes Against Humanity** per 18 USC § 2441 et seq.
- i) Universal and local jurisdiction is provided by the **Convention on the Prevention and Punishment of the Crime of Genocide as further codified under 18 USC § 1091 irrespective of limitations imposed by 18 USCS § 3282**];
- j) Local Jurisdiction is provided by Texas State statute in relation to **Homicide** (all forms, degrees and levels of intent);
- k) Local Jurisdiction is provided by Texas State statute in relation to **Attempted Homicide** (any degree or similarly named crime in state statutes);
- l) Local Jurisdiction is provided by Texas State statute in relation to **Criminal Assault** (any degree or similarly named crime in the State statutes);
- m) Local Jurisdiction is provided by Texas State statute in relation to **Fraud in Connection with Major Disaster or Emergency Benefits** (any degree or similarly named crime in the State statutes);
- n) Probable Cause exists based on the facts, affidavits and exhibits presented herein to believe that one or more crimes was committed by one or more actors in this locality and therefore subjects all other Defendants to local jurisdiction by virtue of the Felony Murder Rule. (MODEL PENAL CODE note 3, § 210.2 at 31 n.74.)
- o) Reasonable Suspicion exists, based on the facts, affidavits and exhibits presented herein to believe that one or more crimes were committed by parties, actors and persons within this jurisdiction to initiate an investigation into the allegations recited herein.

## **THEORY OF THE CASE**

2. This Complaint alleges murder and crimes against humanity arising from a collection of facts, observations, expert opinions, media reports and eye-witness testimony. It will show that Defendants planned and executed, jointly and/or severally, the development and release of a bio warfare toxin, referred to herein as either "SARS-CoV-2" or "Covid 19" and/or as the 'Spike Protein' component with the dual objectives of: 1) global depopulation, and 2) population control leading to a one-world government by inducing panic, economic hardship, terror, death and injury to global populations.

By employing psychological warfare mechanisms, including but not limited to media reports, public policy, coercion, deceit, mandates, bribes, travel restrictions, employment restrictions, free speech restrictions and liberty restrictions, this complaint will also show that Defendants seek to induce the global population into receiving a pre-planned experimental gene therapy commonly referred to as "Covid 19 Vaccines" in furtherance of their aforementioned objectives.

The data, evidence, testimony, articles and interviews provided herein amount to a small fraction of demonstrable / evidentiary material, including but not necessarily limited to: effectiveness, side effects, drugs, hearings, false attributions, vaccine ingredients, lawsuits (past and pending), immunity, and liability.

## **FACTUAL ALLEGATIONS – VIRUS ORIGINS**

3. The sequence of dates and times may not follow a linear path in the presentation of the FACTS as stated hereinafter, because events contributing to the crimes enumerated herein are vast, international in scope and occurred over the course of many years involving numerous defendants, criminal actors, conspirators and collaborators.
4. Dr. Anthony Fauci was appointed Director of the NIAID in 1984. In 1986 Fauci took the first steps toward creating human dependency on vaccines by lobbying for legislation to relieve big pharma of liability through what became the 'Emergency Use Authorization'.

<https://www.bitchute.com/video/IWWRK0fYk5SU/>

5. In 1994 David Rockefeller opined on the need to end self-rule government.

[https://www.lewrockwell.com/2017/03/no\\_author/david-rockefellers-chilling-speech-bilderberg/](https://www.lewrockwell.com/2017/03/no_author/david-rockefellers-chilling-speech-bilderberg/)

6. Addressing the U.N. General Assembly three years later, in 1994 David Rockefeller implored his audience of the imperative of world population control.

[https://www.lewrockwell.com/2017/03/no\\_author/david-rockefellers-chilling-speech-bilderberg/](https://www.lewrockwell.com/2017/03/no_author/david-rockefellers-chilling-speech-bilderberg/)

7. In 1998 Dr. Fauci funded research at the University of North Carolina Chappell Hill (UNC) following Dr. Ralph Baric's clone of the Corona Virus and amplifying the pathogenic "Spike" Protein. In 1999 the Coronavirus was engineered as a bioweapon, paid for by Fauci through NIAID. It was later patented by UNC as the Sars Corona Virus in 2002, a full year before anyone ever heard the name, Sars.

<https://www.bitchute.com/video/IWWRK0fYk5SU/> ;

<https://principia-scientific.com/covid-pandemic-was-planned-in-2015-by-gang-of-rico-conspirators/> ;

<https://www.bitchute.com/video/IWWRK0fYk5SU/>

8. In or about May 2010, the Rockefeller Foundation and Global Business Network published *Scenarios for the Future of Technology and International Development*, which outlines a scenario whereby World powers utilize a global pandemic, naturally occurring or man-made, that presents an opportunity to technocratically control humanity and reduce the size of the global population. See: **LOCK STEP Scenario, Narratives**, *A world of tighter top-down government control and more authoritarian leadership, with limited innovation and growing citizen pushback (page 18)*. Said publication provided the framework and methodology for the planning and preparation of a planned bio warfare attack on the global population now affecting every person in every country and in every location on the planet, thus proving motive or the *mens rea* element for the crimes alleged herein.

<https://principia-scientific.com/2010-rockefellers-operation-lockstep-predicted-2020-lockdown/>

[https://www.centerforhealthsecurity.org/news/center-news/2017/2017-10-23\\_spars-scenario.html](https://www.centerforhealthsecurity.org/news/center-news/2017/2017-10-23_spars-scenario.html)

9. Though framed in less sinister terms, in a meeting convened by Bill Gates on or about 1 March 2013, persons including but not limited to: Dr. Anthony Fauci, Mr. Eli Broad, Mr. Theodore (Ted) Turner, Mr. Warren Buffet, Ms. Oprah Winfrey, Mr. George Soros, Mr. William Gates Jr., and other Defendants met in New York for the purpose of planning mass reduction of the World's population, as evidenced in part by the presence of Dr. Fauci, the only non-billionaire believed there present.

<https://www.wsj.com/articles/BL-WHB-1322;>

[https://www.telegraph.co.uk/finance/newsbysector/banksandfinance/5363613/Oprah-Winfreys-charity-challenge.html;](https://www.telegraph.co.uk/finance/newsbysector/banksandfinance/5363613/Oprah-Winfreys-charity-challenge.html)

<https://www.thetimes.co.uk/article/billionaire-club-in-bid-to-curb-overpopulation-d2fl22qhl02;>

<https://fort-russ.com/2020/04/bill-gates-and-the-depopulation-agenda-rfk-jr-calls-for-an-investigation/>

10. On or about 17 February 2017, Defendant Gates predicted a world-wide pandemic at the 53 Munich Security Conference stating, “Bioterrorism has become feasible enough that a genetic engineer could use computers to create a synthetic airborne pathogen capable of wiping out a fraction of the world’s population quickly. The next epidemic could originate on the computer screen of a terrorist intent on using genetic engineering to create a synthetic version of the smallpox virus, or a super contagious and deadly strain of the flu. [emphasis added]”.

[https://www.huffpost.com/entry/bill-gates-warns-that-a-devastating-pandemic-is-right-around-the-corner\\_n\\_58a889a7e4b045cd34c22c71](https://www.huffpost.com/entry/bill-gates-warns-that-a-devastating-pandemic-is-right-around-the-corner_n_58a889a7e4b045cd34c22c71)

11. On or about 9 November 2015 Defendant Baric published A SARS-like Cluster of Circulating Bat Coronaviruses Shows Potential for Human Emergence, which was the result of his research to create such a virulent disease with manufactured “gain-of-function” in order to increase transmissibility. Said report was directed and sent to Defendant Fauci, stating in part: “Having established that the SHC014 spike has the ability to mediate infection of human cells and cause disease in mice, we next synthesized a full-length SHC014-CoV infectious clone based on the approach used for SARS-CoV.”

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4797993/>

12. On or about 9 November 2015, in the same scientific paper titled A SARS-like Cluster of Circulating Bat Coronaviruses Shows Potential for Human Emergence, Defendant Baric states: “to examine the emergence potential (that is, the potential to infect humans) of circulating bat CoVs, **we built a chimeric virus** encoding a novel, zoonotic CoV spike protein . . . Using this approach, we characterized CoV infection mediated by the SHC014 spike protein in primary human airway cells and *in vivo and conclude* these results confirm that the DIV vaccine would not be protective against infection with SHC014 and could possibly augment disease in the aged-vaccinated group.” [Emphasis added].

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4797993/>

13. Between January 2014 and December 2020, Defendant Fauci, along with other named and unnamed Defendants through their instrumentalities, including but not limited to the National Institutes of Health, EcoHealth Alliance and the Department of Health and Human Services, provided samples of bio warfare agents and funding to the Wuhan level 4 biolab for the purpose of continuing “gain-of-function” research. Though Fauci told congress under oath that the purpose was not gain-of-function, evidence would later prove he lied.

<https://www.thesun.co.uk/news/15069561/fauci-admits-us-sent-600k-wuhan-lab-covid/>

[https://www.theepochtimes.com/mkt\\_breakingnews/newly-released-documents-detail-us-funded-coronavirus-research-at-wuhan-institute-of-virology-report\\_3984829.html?utm\\_source=News&utm\\_medium=email&utm\\_campaign=breaking-2021-09-07-1&mktids=aa419e5baa3f48d215373eefc5a526fa&est=pde0%2FPtXLKf8aKkmrE00GWRUpopYL3T84p9ndaAtbRQxTO19jsi4paTQ2OGr](https://www.theepochtimes.com/mkt_breakingnews/newly-released-documents-detail-us-funded-coronavirus-research-at-wuhan-institute-of-virology-report_3984829.html?utm_source=News&utm_medium=email&utm_campaign=breaking-2021-09-07-1&mktids=aa419e5baa3f48d215373eefc5a526fa&est=pde0%2FPtXLKf8aKkmrE00GWRUpopYL3T84p9ndaAtbRQxTO19jsi4paTQ2OGr)

[https://www.theepochtimes.com/mkt\\_breakingnews/newly-released-documents-detail-us-funded-coronavirus-research-at-wuhan-institute-of-virology-report\\_3984829.html?utm\\_source=News&utm\\_medium=email&utm\\_campaign=breaking-2021-09-07-1&mktids=aa419e5baa3f48d215373eefc5a526fa&est=pde0%2FPtXLKf8aKkmrE00GWRUpopYL3T84p9ndaAtbRQxTO19jsi4paTQ2OGr](https://www.theepochtimes.com/mkt_breakingnews/newly-released-documents-detail-us-funded-coronavirus-research-at-wuhan-institute-of-virology-report_3984829.html?utm_source=News&utm_medium=email&utm_campaign=breaking-2021-09-07-1&mktids=aa419e5baa3f48d215373eefc5a526fa&est=pde0%2FPtXLKf8aKkmrE00GWRUpopYL3T84p9ndaAtbRQxTO19jsi4paTQ2OGr)

<https://www.msn.com/en-us/health/medical/nih-admits-to-funding-gain-of-function-research-in-wuhan-says-ecohealth-violated-reporting-requirements/ar-AAPNb5m?ocid=winsf&fbclid=IwAR3t8oZQ2kxjx5ci2GThHu9TVI5XGbn34HicVzX8Mwl6tS9qtqCzomfZbM0>

14. In 2014 Dr. Anthony Fauci sent a letter to UNC acknowledging that its research was “gain-of-function”, again a point about which he would later lie in Congressional testimony. DOD documents discovered in a “Top Secret Shared Drive” likewise prove Fauci’s knowledge of and support for gain-of-function research.

[https://www.bitchute.com/video/IWWRK0fYk5SU/;](https://www.bitchute.com/video/IWWRK0fYk5SU/)

<https://www.msn.com/en-us/news/politics/nih-admits-fauci-lied-about-funding-wuhan-gain-of-function-experiments/ar-AAPLZle> ;

<https://www.projectveritas.com/news/military-documents-about-gain-of-function-contradict-fauci-testimony-under/>

15. In 2015, Defendant Gates stated, “that an infectious disease pandemic posed a greater threat to the world than nuclear war;” and that “If anything kills over 10 million people over the next few decades, it’s most likely to be a highly infectious virus rather than a war — not missiles, but microbes.”

<https://www.rev.com/blog/transcripts/bill-gates-ted-talk-transcript-from-2015-warns-of-pandemics-epidemics> ;

<https://pubchem.ncbi.nlm.nih.gov/patent/US-7776521-B1#section=Inventor>

16. In 2015, Dr. Peter Daszak, then CEO of EcoHealth Alliance, in an address to the National Academy of Science, spoke on the need to promote a major pandemic, saying that “*until an infectious disease crisis is very real, present, and at an emergency threshold it is often*

*ignored. To sustain the funding base beyond the crisis, he said, we need to increase public understanding of the need for MCM's such as a pan-influenza or pan-coronavirus vaccine. A key driver is the media, and the economics follows the hype. We need to use that hype to our advantage to get to the real issues. Investors will respond if they see profit at the end of the process".*

<https://principia-scientific.com/covid-pandemic-was-planned-in-2015-by-gang-of-rico-conspirators/>

17. In 2016 UNC announced that the Sars Coronavirus was poised for human immersion, referencing the Wuhon Viral Institute.

<https://www.bitchute.com/video/IWWRK0fYk5SU/>

18. On or about 17 January 2017, Defendant Fauci met with and warned the newly elected President Trump, "There is no question that there will be a challenge to the coming administration in the arena of infectious diseases," further stating, "The thing we're extraordinarily confident about is that we are going to see this in the next few years."

[https://www.huffpost.com/entry/fauci-warned-of-trump-pandemic-2017\\_n\\_5e8a0548c5b6e7d76c65c8a4](https://www.huffpost.com/entry/fauci-warned-of-trump-pandemic-2017_n_5e8a0548c5b6e7d76c65c8a4)

19. In February 2017, just two to three weeks after his inauguration, Dr. Fauci foretold of President Trump having to deal with a major, global pandemic during his first term in office.

<https://www.youtube.com/watch?v=puqaaeLnEww>

20. On or about 23 March 2019, Defendant WHO declared and published its first "Situation Report" thereby triggering the claim against a \$500,000,000 Pandemic Insurance Financing Bond issued by Defendant World Bank for the purpose of ratifying the pandemic declaration and payment of funds to other named and unnamed Defendants, including payments made or recovered pursuant to Covid 19 PCR test kits patented and previously sold or financed in 2015 and 2018 respectively, one to five years prior to the renaming of SARS-COV-2's official designation as Covid 19.

<https://foreignaffairsintelligencecouncil.files.wordpress.com/2021/02/rothschilds-patented-covid-19-biometric-tests-in-2015.-and-2017.pdf> ;

**(original link deleted)**

<https://wits.worldbank.org/trade/comtrade/en/country/ALL/year/2018/tradeflow/Imports/partner/WLD/nomen/h5/product/382> ;

<https://www.who.int/emergencies/diseases/novel-coronavirus-2019/donate>

21. On or about 18 October 2019, associates of the named and unnamed Defendants caused the release of the manufactured SARS-COV-2 Coronavirus in Wuhan, China at the **7th CISM Military World Games**, intentionally or with such wanton disregard for human life that homicidal intent is inferred through the knowledge and malice aforethought of the implications and ramifications on global health and world populations by means of the enhanced transmissibility and virulent, harmful, deadly and contagious features of the bioweapon later named officially by Defendants as the “Covid 19 Virus”.

<https://www.news.com.au/world/coronavirus/leaked-chinese-document-reveals-a-sinister-plan-to-unleash-coronaviruses/news-story/53674e8108ad5a655e07e990daa85465>

22. In or about January 2020, named and unnamed Defendants together with their conspirators and collaborators caused the Covid 19 Virus to be transmitted into the United States with knowledge and malice aforethought for the purpose of creating and declaring a Global Pandemic as defined by the World Health Organization pursuant to the International Health Regulations 2005 as amended and pursuant to the provisions of Global Preparedness Report of 2019.

<https://www.who.int/ihr/9789241596664/en/> ;

<https://www.foxnews.com/media/chinese-virologist-government-intentionally-coronavirus>

23. On or about March 11, 2020, Defendants Dr. Fauci and NIH were made aware of the fabricated nature of the Covid 19 Virus when Virologist Adam Gaertner sent an email containing the exact manufacturing process by which the Covid 19 was created, including components designed to impair or obstruct normal immunological response. The mechanism by which the Virus was created (“cookbook”) was available to Defendants Fauci and NIH for investigation and analysis at the very beginning of the intentional outbreak in the United States; yet Defendants along with their co-conspirators maintained the narrative that the Virus was naturally occurring until June of 2021. It was Defendants Fauci, NIH, Baric, Collins, Daszak and others that funded, collaborated and disguised the Virus in an effort to ensure their stated goals and warning to President Trump; “The thing we’re extraordinarily confident about is that we are going to see this in the next few years”.

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4797993/> ;

[https://www.huffpost.com/entry/fauci-warned-of-trump-pandemic-2017\\_n\\_5e8a0548c5b6e7d76c65c8a4](https://www.huffpost.com/entry/fauci-warned-of-trump-pandemic-2017_n_5e8a0548c5b6e7d76c65c8a4)

24. Newly released emails show that Drs. Anthony Fauci and Francis Collins pressured a group of scientists to abandon their intention to publish a report refuting the premise of a naturally occurring virus, raising instead the possibility that it was “genetically manipulated” and likely leaked from the Wuhan Laboratory.

<https://thefederalist.com/2022/01/13/fauci-collins-pressured-scientists-to-abandon-paper-on-covid-origins-and-potential-wuhan-lab-leak/>

[https://www.youtube.com/watch?v=sD0i\\_YxPATc](https://www.youtube.com/watch?v=sD0i_YxPATc)

25. Other evidence of attempted cover up include testimony by former Chinese Scientist Dr. Li-Meg Yan, emails released through FOIA efforts exposing government efforts to hide conversations between scientists, and the disclosure of emails that show Fauci and other health officials sought to promote the natural origin theory despite having evidence and internal expert opinions that pointed to the possibility of a leak from the Wuhan lab.

<https://www.foxnews.com/world/chinese-virologist-coronavirus-cover-up-flee-hong-kong-whistleblower>

[https://www.dailymail.co.uk/news/article-10052689/Government-condemned-refusing-release-details-key-email-conversations-Covid-origins.html?fbclid=IwAR3An7M1Fqrm1oMhcMtblhbUP0KmTAdi-CrtjuJELJud5p\\_OA7J1tExWMI0](https://www.dailymail.co.uk/news/article-10052689/Government-condemned-refusing-release-details-key-email-conversations-Covid-origins.html?fbclid=IwAR3An7M1Fqrm1oMhcMtblhbUP0KmTAdi-CrtjuJELJud5p_OA7J1tExWMI0)

[https://www.theepochtimes.com/mkt\\_morningbrief/fauci-was-told-privately-by-key-scientists-that-natural-origin-was-highly-unlikely-newly-unredacted-emails-confirm\\_4207003.html?utm\\_source=Morningbrief&utm\\_medium=email&utm\\_campaign=mb-2022-01-12&mktids=d1e62fbaafc1a1101bd7071f31bb0874&est=Zgo%2FQaWCqYHhahfSXyJ MmRzJbZU0NpbOhlU1bRkJj14ZO%2Fpla3QM5%2FE3vW3m](https://www.theepochtimes.com/mkt_morningbrief/fauci-was-told-privately-by-key-scientists-that-natural-origin-was-highly-unlikely-newly-unredacted-emails-confirm_4207003.html?utm_source=Morningbrief&utm_medium=email&utm_campaign=mb-2022-01-12&mktids=d1e62fbaafc1a1101bd7071f31bb0874&est=Zgo%2FQaWCqYHhahfSXyJ MmRzJbZU0NpbOhlU1bRkJj14ZO%2Fpla3QM5%2FE3vW3m)

26. In or about December 2021, referencing books by Drs. Pam Popper and Peter Breggin, Dr. Peter McCullough, in an interview with Joe Rogan, claims the existence of proof that the entire pandemic was planned, coordinated and perpetrated on the people to induce the people to accept the experimental vaccines.

<https://www.redvoicemedia.com/2021/12/theres-proof-the-pandemic-was-coordinated-planned-effort-for-mass-vaccination-dr-mccullough-video/>

## **FACTUAL ALLEGATIONS – VACCINE DEVELOPMENT & PROMOTION**

27. On or about October 24, 2021, Bayer Pharmaceuticals CEO Stefan Oelrich, in a presentation at the World Health Summit in Berlin, Germany, shared with international “experts” from academia, politics, and the private sector that the novel mRNA COVID vaccines are actually “cell and gene therapy” that would have otherwise been rejected by the public if not for a “pandemic” and favorable marketing.

<https://www.lifesitenews.com/news/bayer-executive-mrna-shots-are-gene-therapy-marketed-as-vaccines-to-gain-public-trust/>

Harris County  
State of Texas

28. On or about September 18, 2019, the WHO published a “Worldwide Exercise in the Release of Respiratory Pathogens”, to facilitate a worldwide acceptance of a vaccine.

<https://www.bitchute.com/video/IWWRK0fYk5SU/>

29. On or about September 19, 2019, then President Donald Trump signed an Executive Order laying out a pathway for the “Warp Speed” development of a vaccine. Dr. Fauci would later tell congress on or about December 4, 2019, that the President’s E.O. gave him authorization to make the mRNA vaccine.

<https://www.bitchute.com/video/IWWRK0fYk5SU/> ;

30. In or about October 2019, Defendants Gates, Fauci, Brix, the NIH, CDC and WHO, together with associated conspirators planned, orchestrated and conducted Event 201 whereby they practiced their global and industry-wide response to their criminal enterprise.

<https://www.centerforhealthsecurity.org/event201/about>

31. On or about September 2015, Defendants Richard A. Rothschild & the Pirbright Institute developed and patented the “Covid 19” Polymerase Chain Reaction (“PCR”) test kit, four and a half years before the discovery of the Novel Corona Virus SARS 2, later renamed “Covid 19” in March of 2020.

<https://foreignaffairsintelligencecouncil.files.wordpress.com/2021/02/rothschilds-patented-covid-19-biometric-tests-in-2015.-and-2017.pdf> ;

<http://stateofthenation.co/?p=7130> ;

<https://raypeatforum.com/community/threads/cdc-lowers-pcr-ct-count-and-diagnostic-guidelines-only-for-the-vaccinated.40549/>

32. In or about January 2018, the World Bank, together with its affiliated financing subsidiaries and associated entities, including the International Monetary Fund (“IMF”), financed the purchase of Covid 19 Polymerase Chain Reaction (“PCR”) Test kits for more than 50 countries world-wide. Said kits were specifically for the purpose of diagnosing Covid 19, which was a disease that did not exist in 2018 and the Novel Corona Virus SARS 2 was not named as “Covid 19” until March of 2020; yet the World Bank not only financed the acquisitions of the tests but referenced them as being used to detect “Covid 19”, a heretofore undefined disease.

**(original link deleted)**

<https://wits.worldbank.org/trade/comtrade/en/country/ALL/year/2018/tradeflow/Imports/partner/WLD/nomen/h5/product/382>

Harris County  
State of Texas

33. On or about 24 December 2020, Defendants WHO, CDC, NIH, among others, fraudulently and intentionally caused governments, ministries, hospitals and global health services to mandate the use of ineffective face masks and utilize and incorporate the use of knowingly ineffective PCR tests among the global population for the purpose of inciting fear, terror and coercion among the complainants. In fact, the inventor of the PCR test stated, “Anyone can test positive for practically anything with a PCR test, if you run it long enough”.

[https://stephenlendman.org/2021/04/pcr-tests-dont-work-and-risk-harm/;](https://stephenlendman.org/2021/04/pcr-tests-dont-work-and-risk-harm/)

<https://www.cdc.gov/media/releases/2020/s1224-CDC-to-require-negative-test.html>

34. In or about October 2020, three of the world’s top-tiered Epidemiologists: Drs. Martin Kulldorff, Professor of Medicine Harvard University and a biostatistician at Brigham and Women’s Hospital; Sunetra Gupta, Professor of Theoretical Epidemiology Oxford University; and Jay Bhattacharya, Professor of Medicine Stanford University, along with forty-three initial co-signers (and as of this compliant now just under one million) imploring establishment officials to focus their approach on those at greatest risk, exposing in the process the societal consequences of a mass approach. Emails since released in a Congressional House staff report show that both Dr. Anthony Fauci and former NIH Director, Francis Collins, conspired to discredit the Barrington Declaration and disparage its authors by pushing for a fresh round of lockdowns.

[www.gbdeclaration.org](http://www.gbdeclaration.org)

[https://www.theepochtimes.com/new-emails-reveal-evidence-of-government-efforts-to-suppress-free-speech\\_4171310.html?utm\\_source=News&utm\\_campaign=breaking-2021-12-22-1&utm\\_medium=email&est=NADAxH1Z25TmdFef444ksyIimQB NauqsNULV%2BylW5iWpkMDD9zlvPgDQXDUc](https://www.theepochtimes.com/new-emails-reveal-evidence-of-government-efforts-to-suppress-free-speech_4171310.html?utm_source=News&utm_campaign=breaking-2021-12-22-1&utm_medium=email&est=NADAxH1Z25TmdFef444ksyIimQB NauqsNULV%2BylW5iWpkMDD9zlvPgDQXDUc)

## **FACTUAL ALLEGATIONS – HOSPITALIZATIONS & CENSORED THERAPEUTICS & PHYSICIAN PEROGATIVES**

35. In or about September 2021, an international group of about 3,000 physicians and scientists signed a declaration Friday accusing COVID-19 policy makers of “crimes against humanity” for preventing the use of life saving treatments on their patients.

<https://humanevents.com/2021/09/27/3000-doctors-scientists-accuse-covid-policy-makers-of-crimes-against-humanity/>

36. A ‘Frontline Physician’ explains that between the financial inducements of the “CARES Act” and Patient Rights waivers granted by the Center for Medicare and Medicaid Services (CMS).

[https://www.facebook.com/watch/?v=815270466322332&aggr\\_vids%5b0%5d=815270466322332&aggr\\_vids%5b1%5d=270284701862862](https://www.facebook.com/watch/?v=815270466322332&aggr_vids%5b0%5d=815270466322332&aggr_vids%5b1%5d=270284701862862)

[https://en.wikipedia.org/wiki/CARES\\_Act#:~:text=The%20Coronavirus%20Aid%2C%20Relief%2C%20and%20Economic%20Security%20Act%2C,of%20the%20COVID-19%20pandemic%20in%20the%20United%20States.](https://en.wikipedia.org/wiki/CARES_Act#:~:text=The%20Coronavirus%20Aid%2C%20Relief%2C%20and%20Economic%20Security%20Act%2C,of%20the%20COVID-19%20pandemic%20in%20the%20United%20States.)

37. In or about December 2021, Dr. Vladimir Zelenko, New York Physician who treated President Donald Trump. Brazil's Jair Bolsonaro and Israel's Benjamin Netanyahu, explains how early Covid treatments were sabotaged in 2020 by former BARDA Director Dr. Rick Bright collaborating with Dr. Janet Woodcock, current Director of the FDA, in contravention to the Executive Order issued in 2020 by then President Donald Trump to make Hydroxychloroquine universally available.

[https://www.redvoicemedia.com/video/2021/12/dr-zelenko-exposes-how-early-covid-treatments-were-sabotaged-by-dr-rick-bright-killing-masses/?utm\\_source=daily-email&utm\\_medium=email](https://www.redvoicemedia.com/video/2021/12/dr-zelenko-exposes-how-early-covid-treatments-were-sabotaged-by-dr-rick-bright-killing-masses/?utm_source=daily-email&utm_medium=email)

38. In or about June 2020 the Association of American Physicians and Surgeons (AAPS) sued the FDA to end its arbitrary restrictions on Hydroxychloroquine.

<https://aapsonline.org/hcqsuit/>

39. In or about March 2021, Dr. Peter McCullough, in testimony before the Texas Senate, explained how the denial of therapeutic drug treatments resulted in the hospitalizations and subsequent deaths of thousands of people.

<https://www.youtube.com/watch?v=QAHi3IX3oGM>

40. In or about July 2020 a group of American physicians on the steps of the U.S. Capitol held a press conference to address the censorship of therapeutic drugs for the treatment of the Covid virus.

<https://www.breitbart.com/politics/2020/07/28/watch-live-silenced-frontline-doctors-hold-capitol-hill-press-conference-to-challenge-big-tech/?fbclid=IwAR3JsFMDemrPWXpXtnmyvB5DxRzhjBGqpbidRLYOaYawicfbR-27ffKXI>

41. In and around the dates of September 2020 to May, 2021, named and unnamed Defendants, including but not limited to the CDC, WHO, NIH, fraudulently coerced, mandated, tricked and conducted a criminal scheme to increase the fear and terror among the global population by economically rewarding hospitals, physicians, governments, ministries and health service providers with pecuniary rewards up to US \$400,000 per case for diagnosing substantially all sickness, morbidity and fatalities as being caused by Covid 19.

<https://www.cdc.gov/coronavirus/2019-ncov/travelers/testing-international-air-travelers.html>;

<https://www.ahcancal.org/Survey-Regulatory-Legal/Emergency-Preparedness/Documents/COVID19/Testing-Requirements-FAQs.pdf>

42. On or about 22 August 2005, Defendant Fauci and Defendant NIH declared Hydroxychloroquine (HCQ) a 'wonder drug' for the treatment of SARS-COV-1 and MERS, stating in *The Virology Journal* (Defendant NIH's publication) that "Chloroquine is a potent inhibitor of SARS Coronavirus spread." Yet, on or about July 30, 2020, Defendant Fauci testified to Congress that Hydroxychloroquine has "**no therapeutic effect**" on Covid 19.

<https://news.yahoo.com/fauci-shoots-down-flawed-hydroxychloroquine-183931215.html>

43. On or about 20 January 2021, Defendants Fauci and NIH publicly dismissed and subverted the use of Ivermectin, a known and generic antiviral medication that clinically demonstrated a significant reduction in Covid 19 viruses within a 48-hour period. Congressional testimony by Dr. Pierre Kory in December 2020 reported a substantial success rate using Ivermectin as both a prophylactic and cure after conducting a review of dozens of peer reviewed trials, studies and publications.

[www.bitchute.com/video/YnSppbsgDBYS/](http://www.bitchute.com/video/YnSppbsgDBYS/)

<https://www.medsearchuk.com/controversy-flares-over-ivermectin-for-covid-19-controversy-flares-over-ivermectin-for-covid-19/> ;

<https://www.thegatewaypundit.com/2021/06/smoking-gun-fauci-lied-millions-died-fauci-informed-hydroxychloroquine-worked-lied-public-instead-despite-science-fauciemails/>

44. On or about January 31, 2020, Defendants Fauci, Collins, Farrar and Daszak conspired to and did conduct a fraudulent clinical trial, in response to positive reports about the benefits of HCQ, wherein they overdosed patients with Hydroxychloroquine for the purpose of creating a published report discounting the drug's efficacy and labeling it dangerous and deadly; said conspiratorial conduct, including the publishing of fraudulent results in several peer-reviewed scientific journals, including *The Lancet* and *Nature*, is now revealed in their own notes, emails and documents pursuant to a Freedom of Information Act request by and published by *Buzzfeed*. See also disclosure of same by Dr. Vladimir Zelenko.

<https://www.childrenshealthdefense.org/defender/fauci-emails-top-public-health-officials-lies-covid-origin-treatments/> ;

[https://www.redvoicemedia.com/video/2021/12/dr-zelenko-exposes-how-early-covid-treatments-were-sabotaged-by-dr-rick-bright-killing-masses/?utm\\_source=daily-email&utm\\_medium=email](https://www.redvoicemedia.com/video/2021/12/dr-zelenko-exposes-how-early-covid-treatments-were-sabotaged-by-dr-rick-bright-killing-masses/?utm_source=daily-email&utm_medium=email)

**(link since deleted)**

<https://www.msn.com/en-us/health/medical/fda-denies-henry-ford-s-request-for-hydroxychloroquine-approval/ar-BB17VGtg>

45. In or about March 2020, Dr. Rick Bright, former Director of the Biomedical Advance Research and Development Authority (BARDA), in a conspiracy with Dr. Janet Woodcock, current Director of the FDA, sought to thwart an Executive Order issued by then President Donald Trump to make HCQ universally available by designating it as an “Emergency Use Authorization” (EUA) treatment available only to hospitalized patients.

[https://www.redvoicemedia.com/video/2021/12/dr-zelenko-exposes-how-early-covid-treatments-were-sabotaged-by-dr-rick-bright-killing-masses/?utm\\_source=daily-email&utm\\_medium=email](https://www.redvoicemedia.com/video/2021/12/dr-zelenko-exposes-how-early-covid-treatments-were-sabotaged-by-dr-rick-bright-killing-masses/?utm_source=daily-email&utm_medium=email)

46. On November 19, 2020, testifying before the **Senate Homeland Security Committee Hearing on COVID-19 Outpatient Treatment**, Dr. Peter McCullough (Epidemiologist, Cardiologist and Professor of Medicine at Texas A&M University, who opines frequently as an expert on the use of antiviral medications for the treatment of Covid 19 infections and prevention) described in detail the success of the antiviral medications, clinical studies and treatment protocols that were saving lives at the time. Dr. McCullough also provided statistical data in his testimony to the US senate that 50% of the American lives lost could have been saved with early treatment (4-6 drugs in combination). On March 10, 2021, Dr. McCullough testified in the Texas Senate that 85% of the lives lost could have been saved since “we had evolved better treatment programs.” The current estimate is 85% of lives lost could have been saved, according to Dr. McCullough.

<https://www.authorea.com/users/414448/articles/522499-sars-cov-2-mass-vaccination-urgent-questions-on-vaccine-safety-that-demand-answers-from-international-health-agencies-regulatory-authorities-governments-and-vaccine-developers>

[https://www.theepochtimes.com/dr-mccollough-says-outpatient-treatments-for-covid-19-have-been-suppressed\\_4189353.html?utm\\_source=News&utm\\_campaign=breaking-2022-01-03-3&utm\\_medium=email&est=wtsFuGXW3lJTnP3Flc6%2FaVqfraBrKTCsD0gbjRLHWzS5aSoBYgBCYKN%2FyTyd](https://www.theepochtimes.com/dr-mccollough-says-outpatient-treatments-for-covid-19-have-been-suppressed_4189353.html?utm_source=News&utm_campaign=breaking-2022-01-03-3&utm_medium=email&est=wtsFuGXW3lJTnP3Flc6%2FaVqfraBrKTCsD0gbjRLHWzS5aSoBYgBCYKN%2FyTyd)

47. The aforementioned testimony patently contradicted the subversive messaging and publications Defendants Fauci, Daszak, Collins and Farrar orchestrated with their co-conspirators. Effectively, no policy change resulted even after a redaction by said publications as it relates to the conduct of the Defendants aforementioned; and, the FDA persisted in its banning of the emergency use of HCQ as a treatment alternative.

Harris County  
State of Texas

<https://ratical.org/PandemicParallaxView/DrMcCulloughC19OutpatientTreatment.html>;

<https://www.nejm.org/doi/full/10.1056/NEJMoa2012410>

48. On or about September 2021, an international group of about 3,000 physicians and scientists signed a declaration Friday accusing COVID-19 policy-makers of “crimes against humanity” for preventing the use of life saving treatments on their patients.

<https://humanevents.com/2021/09/27/3000-doctors-scientists-accuse-covid-policy-makers-of-crimes-against-humanity/>

49. On or about September 28, 2021, Ontario Physician Dr. Patrick Phillips, speaks out about authorities shutting down his practice for violating Covid protocol.

<https://brightlightnews.com/full-interview-dr-patrick-phillips-the-war-against-medical-tyranny/>

50. In or about December 2021, Dr. Peter McCullough questions why governments and public health officials around the world have put little to no emphasis on outpatient treatments in their efforts to fight the COVID-19 virus, instead promoting a massive effort on vaccines.

[https://www.theepochtimes.com/dr-mccollough-says-outpatient-treatments-for-covid-19-have-been-suppressed\\_4189353.html?utm\\_source=News&utm\\_campaign=breaking-2022-01-03-3&utm\\_medium=email&est=wtsFuGXW3lJTnP3Flc6%2FaVqfraBrKTCsD0gbjRLHWzS5aSoBYgBCYKN%2FyTyd](https://www.theepochtimes.com/dr-mccollough-says-outpatient-treatments-for-covid-19-have-been-suppressed_4189353.html?utm_source=News&utm_campaign=breaking-2022-01-03-3&utm_medium=email&est=wtsFuGXW3lJTnP3Flc6%2FaVqfraBrKTCsD0gbjRLHWzS5aSoBYgBCYKN%2FyTyd)

## **FACTUAL ALLEGATIONS – POST VACCINATION REACTIONS AND DEATHS**

51. As of May 28, 2021, the Vaccine Adverse Reaction Reporting System details in excess of 5,100 fatalities and more than 294,000 Serious Adverse Events (“SAE”) and serious injuries resulting from all four mRNA vaccines produced by the Defendant Manufacturers. It is worth noting that the VAERS system collects only a fraction of the actual injuries or fatalities, in this instance by an estimated 4 to 5 times according to Dr. Peter McCullough.

<https://cleverjourneys.com/2021/05/31/serious-adverse-events-after-covid-vaccines-soar-for-12-17-year-olds/> ;

<https://www.openvaers.com/covid-data> ;

[https://childrenshealthdefense.org/defender/vaers-data-deaths-reported-following-covid-vaccines/?utm\\_source=salsa&eType=EmailBlastContent&eId=d7469d69-4a7b-4b6b-9134-](https://childrenshealthdefense.org/defender/vaers-data-deaths-reported-following-covid-vaccines/?utm_source=salsa&eType=EmailBlastContent&eId=d7469d69-4a7b-4b6b-9134-)

Harris County  
State of Texas

[https://www.redvoicemedia.com/2021/12/shocking-vaers-data-jab-injuries-deaths-nears-1-million-underreported-4-5x-dr-peter-mccullough-video/?utm\\_source=daily-email&utm\\_medium=email](https://www.redvoicemedia.com/2021/12/shocking-vaers-data-jab-injuries-deaths-nears-1-million-underreported-4-5x-dr-peter-mccullough-video/?utm_source=daily-email&utm_medium=email)

52. In or about June 2021, CDC VAERS data reports a spike > 5,000 mRNA vaccine deaths; the Swine Flu Vaccine was pulled at a reported 26 deaths.

<https://coronaneews123.wordpress.com/2021/06/12/possible-related-mrna-injection-deaths-spike-over-5800-swine-flu-vax-was-shut-down-after-25-deaths/>

53. In or about February 2021, CDC data revealed that the Covid Vaccines are about 18K% more deadly than Flu Vaccines.

<https://greatmountainpublishing.com/2021/02/17/cdc-data-reveals-that-the-covid-19-vaccines-are-18000-more-deadly-than-the-flu-vaccines/>

54. On or about August 25, 2021, it was reported that the CDC counts people who died within 14 days of an injection as “Unvaccinated”.

<https://newsrescue.com/trust-science-cdc-counts-people-who-died-within-14-days-of-jab-as-unvaccinated/>

55. The CDC quietly updated its 2019 Covid death numbers, admitting that only 6% of all the 153,504 deaths recorded were actually a result of the Covid Virus.

[https://www.cdc.gov/nchs/nvss/vsrr/covid\\_weekly/index.htm?fbclid=IwAR2-muRM3tB3uBdbTrmKwH1NdaBx6PpZo2kxot](https://www.cdc.gov/nchs/nvss/vsrr/covid_weekly/index.htm?fbclid=IwAR2-muRM3tB3uBdbTrmKwH1NdaBx6PpZo2kxot)

56. In or about October 2021, U.S. Senator Ron Johnson revealed that about 63% of U.K. deaths from the Delta Variant were fully vaccinated.

<https://www.thegatewaypundit.com/2021/10/boom-sen-ron-johnson-drops-truth-bomb-senate-floor-63-uk-delta-deaths-last-7>

57. In or about September 2021, a group of German pathologists and scientists presented findings from a first-ever comprehensive, independent set of autopsies of people who had died unexpectedly within 2 weeks of the COVID vaccine injections. One pathologist calculated that, for a certain broad age group, takers of the injections were 15 times more likely to die from the injections than from COVID.

<https://coronaneews123.wordpress.com/2021/12/24/first-systematic-vaccine-death-autopsies-show-immune-systems-attacking-own-organs/>

<https://pathologie-konferenz.de/en/>

58. According to Osteopathic Physician, Dr. Joseph Mercola, the risks of serious reactions and death are far greater in children than the Covid Virus, itself.

[https://www.theepochtimes.com/more-children-die-from-the-covid-shot-than-from-covid\\_4215381.html](https://www.theepochtimes.com/more-children-die-from-the-covid-shot-than-from-covid_4215381.html)

59. By about July 2021, the CDC's Vaccine Adverse Effects Reporting System (VAERS) showed that reported injuries had already surpassed 400K.

<https://www.theburningplatform.com/2021/07/03/latest-cdc-vaers-data-show-reported-injuries-surpass-400000-following-covid-vaccines/>

60. As of January 2, 2022, the VAERS weekly "Red Box" Report VAERS reached the unprecedented milestone of 1,000,227 injuries following coronavirus vaccines. In the 31-year history of VAERS, there are 9,248 reports of fatalities following all other vaccines. Since the start of the coronavirus vaccine campaign there have been 21,002 reports of death following coronavirus vaccines. It is noted, too, that after approximately 26 reported deaths the Swine Flu Vaccine was stopped.

<https://openvaers.com/component/acym/archive/42-the-openvaers-red-box-report?userid=41119-4pYaAeC5R0wuoB&tmpl=penVAERS>

61. In or about December 2021, Dr. Peter McCullough shares that VAERS under reports for COVID Vaccines by a factor of 4 to 5 times, even though a former Harvard study showed an accuracy rate as low as 1%.

[https://www.redvoicemedia.com/2021/12/shocking-vaers-data-jab-injuries-deaths-nears-1-million-underreported-4-5x-dr-peter-mccullough-video/?utm\\_source=daily-email&utm\\_medium=email](https://www.redvoicemedia.com/2021/12/shocking-vaers-data-jab-injuries-deaths-nears-1-million-underreported-4-5x-dr-peter-mccullough-video/?utm_source=daily-email&utm_medium=email)

62. In or about September 2021, a HHS ER physician discloses in an undercover video that the government does not want to disclose either the content or the side effects of the vaccines.

<https://www.projectveritas.com/news/federal-govt-whistleblower-goes-public-with-secret-recordings-government/>

63. In or about August 2021, Covid vaccine maker Moderna received 300,000 reports of side effects over a three-month period following the launch of its vaccine, according to an internal report from a company that helps Moderna manage the reports. That figure is far higher than the number of side effect reports about Moderna's vaccine publicly available in the federal system that tracks such adverse events.

<https://alexberenson.substack.com/p/some-actual-news>

64. As of January 2022, VAERS Injury and death reports eclipsed one million.

<https://www.redvoicemedia.com/2022/01/vaers-reports-jab-injuries-deaths-pass-1000000-safe-effective-narrative-in-shambles>

**IN RELATION TO DEFENDANT VACCINE MANUFACTURERS: THEIR TRIALS, OFFICERS,  
DIRECTORS & CONSPIRATORS**

65. In or about spring 2021, doctors testified before a Texas Senate Committee that Phase II Trials were abandoned once it was determined that most, if not all, test animals were dying after receiving the vaccine and later exposed to the natural virus.

[https://authenticTEXAN.com/doctor-covid-vaccine-dangers-texas/?fbclid=IwAR0o0Cnwt5GbGkEOfPt8bafw5rqdvYDNX7CvEJR\\_ugrsSmQLkxOfR5ypsQ](https://authenticTEXAN.com/doctor-covid-vaccine-dangers-texas/?fbclid=IwAR0o0Cnwt5GbGkEOfPt8bafw5rqdvYDNX7CvEJR_ugrsSmQLkxOfR5ypsQ)

66. In or about November 2021, a federal district judge rejects DOD claim that the Pfizer EUA and Comirnaty Vaccines are the same.

<https://childrenshealthdefense.org/defender/judge-allen-winsor-pfizer-eua-comirnaty-vaccines-interchangeable/>

67. In or about August 2021, Dr. Robert Malone explains precisely how the Pfizer EUA and BioNTech Comirnaty Vaccines are NOT the same, contrary to efforts of HHS to claim “FDA Approval” essentially applicable to the EUA.

<https://www.thethinkingconservative.com/dr-malone-sounds-alarm-on-liability-coverage-of-pfizer-vaccine/>

68. Multiple reports show that Pfizer has taken a number of liberties with its trials in violation of the rigid guidelines each trial is required to follow:

<https://www.bmj.com/content/375/bmj.n2635>

<https://ifunny.co/picture/dr-benjamin-benulis-dr-benjaminbenulis-today-the-fda-announced-they-Vbbj6Z7s8>

<https://globalcovids Summit.org/news/pharmacological-scientist-hong-reviews-whistleblower-claims-on-the-pfizer-covid-vaccine>

<https://t.me/angiefarellamd/152>

69. Dr. Byrum Bridle, Immunologist at Quelp University, discovers that Pfizer had withheld disclosure of its Biodistribution Study until forced to share it with Japanese officials who insisted on seeing it.

<https://video.foxnews.com/v/6266459580001#sp=show-clips>

70. On or about October 2016, Defendant National Institutes of Health, together with other interested parties, filed for US Patent WO/2018/081318 to create an injectable compound to cause the recipient to produce prefusion coronavirus Spike proteins. This injectable is known as the “Moderna Covid 19 Vaccine”. A recently disclosed 2015, heretofore ‘Confidential’ Agreement between the NIAID and Moderna, show that the two jointly owned the vaccine when at the same time sharing the dataset with UNC’s Dr.

Harris County  
State of Texas

Ralph Baric.

[https://www.huffpost.com/entry/fauci-warned-of-trump-pandemic-2017\\_n\\_5e8a0548c5b6e7d76c65c8a4](https://www.huffpost.com/entry/fauci-warned-of-trump-pandemic-2017_n_5e8a0548c5b6e7d76c65c8a4)

[https://www.facebook.com/messenger\\_media/?thread\\_id=100000487501154&attachment\\_id=946698959307298&message\\_id=mid.%24cAABa830dDwuDmXPbjl9aC6SjcEzq](https://www.facebook.com/messenger_media/?thread_id=100000487501154&attachment_id=946698959307298&message_id=mid.%24cAABa830dDwuDmXPbjl9aC6SjcEzq)

71. Said Moderna Covid 19 Vaccine contains SM-102 (also Luciferase), which is a known poison fatal to humans and animals as disclosed in Moderna's Food and Drug Administration's published ingredients list. See (list of ingredients and toxicity report for SM-102):

<https://www.fda.gov/media/144638/download>

72. In 2015 appeared a heretofore confidential agreement between the NIAID and Moderna proving joint ownership of the Coronavirus mRNA vaccine, the same vaccine that the NIAID, it's parent HHS, and its co-affiliates the CDC and FDA have been aggressively promoting to the public.

[https://www.facebook.com/messenger\\_media/?thread\\_id=100000163206094&attachment\\_id=611712543414486&message\\_id=mid.%24cAABa80qhcaeEE\\_Um7194q\\_hZrAoV](https://www.facebook.com/messenger_media/?thread_id=100000163206094&attachment_id=611712543414486&message_id=mid.%24cAABa80qhcaeEE_Um7194q_hZrAoV)

73. In or about January 2022 it was discovered by physician and Senator Roger Marshall, R-KY, that Dr. Anthony Fauci had been deceitful in his public financial disclosures.

<https://www.foxnews.com/politics/fauci-financial-disclosure-senator-publishes-accuses-biden-advisor-misleading>

74. Moderna and Pfizer mRNA Covid 19 Vaccines are designed to cause the human recipients to mass produce Corona Virus Spike Proteins through messenger RNA stimulus; such Spike Proteins are known to cause acute cardiovascular disease, inflammation and / or blood clotting.

<https://www.salk.edu/news-release/the-novel-coronavirus-spike-protein-plays-additional-key-role-in-illness/>

[https://www.theepochtimes.com/nearly-800-reports-of-heart-inflammation-after-covid-19-vaccination-in-us\\_3853032.html?utm\\_source=News&utm\\_medium=email&utm\\_campaign=breaking-2021-06-10-2&est=%2BTD6%2FBVIpHak5N1LZ8rHTNkrO7l8aQilGowarvHQ2nmnffCC2slU4Xmspqy1](https://www.theepochtimes.com/nearly-800-reports-of-heart-inflammation-after-covid-19-vaccination-in-us_3853032.html?utm_source=News&utm_medium=email&utm_campaign=breaking-2021-06-10-2&est=%2BTD6%2FBVIpHak5N1LZ8rHTNkrO7l8aQilGowarvHQ2nmnffCC2slU4Xmspqy1)

75. Animal testing conducted with the Moderna Covid 19 mRNA Vaccine was undertaken in 2012, which included a “Challenge” study whereby inoculated animals were exposed to the SARS-Cov-2 virus (later called “Covid 19”) and in each and every instance, the test animals developed Pulmonary Immunopathology causing a 100% fatality rate. The conclusions of various scientific journals opine that the deaths of the test animals were not caused directly by the vaccine; rather they were caused by the test subject’s immune response of Spike Protein creation from the changes made to the animals’ immune system by virtue of the messenger RNA in the Vaccine. See:

<https://varjager.wordpress.com/2021/01/30/dr-lee-merritt-in-animal-studies-after-being-injected-with-mrna-technology-all-animals-died-upon-reinfection/>

<http://www.uphs.upenn.edu/cep/COVID/mRNA%20vaccine%20review%20final.pdf>;

[https://www.lewrockwell.com/2021/04/no\\_author/dr-lee-merritt-in-animal-studies-after-being-injected-with-mrna-technology-all-animals-died-upon-reinfection/](https://www.lewrockwell.com/2021/04/no_author/dr-lee-merritt-in-animal-studies-after-being-injected-with-mrna-technology-all-animals-died-upon-reinfection/)

76. Thirteen (13) people died in the Moderna human clinical trials as a result of the said enhanced autoimmune response, which is beyond the industry standard threshold of continued development for marketable use. See

<https://principia-scientific.com/13-people-died-during-modernas-covid-vaccine-trial/>

77. All of the Vaccines produced by the Defendant manufacturers (Johnson & Johnson, Moderna, Pfizer and Astra Zeneca) caused the same immunopathological response in their animal challenge tests conducted years in advance of the Emergency Use Authorization and all experienced up to a 100% fatality rate in their challenge studies. Furthermore, the science was so dispositive that on or about January 25, 2021, Pfizer’s former Chief Science Officer (Dr. Michael Yeadon) warned  
“Governments are lying because they are going to kill you and your family.” See:

<https://www.cdc.gov/vaccines/covid-19/info-by-product/pfizer/reactogenicity.html>

78. All of the Defendant manufacturers knew, or should have known, that their Vaccines caused this immunopathological response and were warned by the FDA against conducting human trials. See:

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7162764/>

79. On or about April 20, 2012, the Federation of Registration Agencies (DOI) published a report that analyzed all of the mRNA vaccines at the time and arrived at the conclusion that each such injection presents a near certainty that all SARS Coronavirus vaccinations lead to Pulmonary Immunopathology upon challenge of the user; meaning that the inoculated person or animal will die when exposed to the virus or (relative thereto) being vaccinated against. This peer-reviewed, common conclusion of scientists

Harris County  
State of Texas

responsible for registration of vaccines arrived at this conclusion more than 8 years in advance of the release, distribution and sale of the Covid Vaccines.

<https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0035421>

80. At all material times Defendants Fauci, Birx, Gates, Tedros, Baric, Daszak and others were acting in their official capacities and had the authority to represent the interest of and contractually bind the institutions or entities by whom they were employed or compensated.

81. At all material times, Defendants Fauci, Rothschild, Gates, Baric, Daszak, NIH, CDC, WHO and other named and unnamed Defendants had economic interests in the intellectual property rights of the Covid 19 Virus or the various Covid 19 Vaccines or both and conspired to economically benefit from the exploitation of these bio- weapons.

<https://www.niaid.nih.gov/research/anthony-s-fauci-md> ;

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2866602/> ;

<https://fort-russ.com/2020/04/breaking-kennedy-exposes-dr-faucis-role-in-creating-highly-infectious-mutant-strain-of-coronavirus/>

## **PUBLICLY AVAILABLE OPINIONS of MEDICAL DOCTORS and BIO-SCIENTISTS**

82. Medical Doctors and scientists in the biological health and treatment of human beings attest to:

a) the fatality rate of the SARS-COV-2, also known as COVID-19, virus (hereinafter "Virus") is .0046% across combined age groups under age 70 in the United States:

<https://www.cdc.gov/coronavirus/2019-ncov/index.html>

b) the case fatality rate was purposefully inflated by Defendants World Health Organization, Centers for Disease Control and Prevention, The National Institutes of Health or any other governmental or non-governmental agency or entity acting with authority to make such a declaration:

<https://www.cnsnews.com/article/washington/melanie-arter/cdc-director-i-think-youre-correct-about-inflated-covid-death>

c) there are widely available and extremely effective therapeutic medicines, inclusive of hydroxychloroquine and ivermectin, that both prevent and treat said Virus:

<https://pubmed.ncbi.nlm.nih.gov/32283237/>

- d) Defendants named herein caused people, entities, organizations and health care services to avoid the use, prescription and delivery of said therapeutic medicines to patients and the public at large and caused the therapeutic medicines to be unavailable to infected individuals and the public, resulting in large numbers of unnecessary injuries and deaths in those that were infected with the Virus:

<https://noqreport.com/2021/05/31/dr-pierre-kory-exposed-whos-suppression-of-ivermectin-youtube-keeps-deleting-this-video/>

- e) credible evidence exists to support a conclusion that interested parties and stakeholders disregarded scientific data and alternative, efficient therapies to coerce people and entities to require COVID-19 injectables as a condition of employment, entry to properties, purchase of goods and services and admission to gatherings:

<https://stateofthenation.co/?p=64361>

- f) the Defendant manufactures of the four “COVID-19 Vaccines” identified herein, have attempted and failed to create a messenger RNA styled vaccine that is suitable for sale or distribution due to safety concerns, fatalities and morbidities experienced during both animal and human trials despite more than 10 years of testing:

<https://edition.cnn.com/2020/09/01/health/eua-coronavirus-vaccine-history/index.html>

- g) the Defendants, manufacturers and other participants, were warned in multiple scientific and media papers that mRNA designed to increase spike protein production is and was hazardous to the users’ autoimmune systems:

<https://principia-scientific.com/halt-covid-vaccine-prominent-scientist-tells-cdc/>

- h) the mRNA and adenoviral injections all code for the original spike protein that was the product of Gain of Function (hereinafter “GOF”) research in Wuhan, China:

<https://childrenshealthdefense.org/defender/covid-vaccine-spike-protein-travels-from-injection-site-organ-damage/>

- i) this laboratory engineered spike protein component created in Wuhan, China is intentionally caused to be produced in humans via the subject COVID-19

injections. Furthermore, said spike protein was intentionally modified at the furin cleavage site of the protein, making the spike protein elicited to be produced in the body by the COVID-19 injections far more dangerous and infectious to the human body than the original spike protein created in Wuhan, China:

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7859469/>

- j) the spike protein elicited to be produced by injection of the purported COVID-19 “vaccines” has intentionally placed sequences of RNA that code for known epitopes of the HIV virus:

<https://www.thegatewaypundit.com/2021/06/caught-top-official-thanks-dr-fauci-email-april-2020-insisting-covid-19-naturally-occurring-men-knew-lie/>);

- k) once administered to humans, all COVID-19 injections cause the human body to produce the modified Wuhan spike protein product of Gain of Function (“GOF”) research in an uncontrolled fashion for as long as two weeks with no regulation mechanism for 1) the concentration of spike protein, 2) the tissues or locations in the body where it is created, 3) its distribution in the body, and 4) the duration of its ability to be produced in the body:

<https://www.pnas.org/content/117/41/25254>

- l) this Wuhan spike protein product of GOF research directly causes damage to blood vessels and major organs, including the lungs, heart, brain, kidneys and liver and directly promotes the development of blood clots in critical organs resulting in permanent disability and death in some cases:

<https://drmalcolmkendrick.org/2021/06/03/covid19-the-spike-protein-and-blood-clotting/>

- m) the United States mass vaccination program is investigational. Defendants, either knowingly or with a duty to know and with a reckless disregard for human life, committed egregious malfeasance that has resulted in harm to at least hundreds of thousands and death to at least many thousands of people, in failing to establish an external unbiased clinical event adjudication committee, data safety monitoring committee, or human ethics committee. As a result, there is no mechanism for risk mitigation in the investigational program (critical event committee, data safety monitoring board, human ethics committee) and this has contributed to causing the aforementioned injuries and deaths. Remarkably, 46% of the deaths that have occurred following the injections have taken place on days 1, 2 or 3 post injection:

<https://www.wsj.com/articles/people-harmed-by-coronavirus-vaccines-will-have-little-recourse-11602432000>

- n) furthermore, in an act of egregious malfeasance, Defendants recommended administration of the experimental injections in large patient groups that were excluded from the registrational trials on the basis of either anticipated lack of benefit or excessive harm, resulting in severe harm and/or death to at least many thousands of people in these groups that were administered the injections. These groups include: COVID-recovered, suspected COVID-recovered, those with positive serologies, pregnant women, and childbearing women who could not assure contraception. In fact, Defendants knowingly administered the COVID-19 injections to individuals with durable natural immunity due to prior infection with COVID-19, despite many known studies spanning decades and demonstrating that these individuals were more susceptible to serious injury from the injections:

[https://www.thelancet.com/journals/langas/article/PIIS2468-1253\(21\)00008-X/fulltext](https://www.thelancet.com/journals/langas/article/PIIS2468-1253(21)00008-X/fulltext)

- o) intentional disregard of the results of the animal challenge studies which resulted in up to 100% fatality rates, was egregious conduct under the norms of the medical communities' policies, procedures, ethical, licensing and other mandates which govern such conduct:

<https://foreignaffairsintelligencecouncil.files.wordpress.com/2021/02/horrific-latent-deaths-predicted-among-the-elderly-by-genetics-professor-after-immunization-with-rna-vaccines.pdf>

- p) Defendant Manufacturers knew or should have known their Emergency Use Authorization would result in mass fatalities of the Users:

<https://www.lifesitenews.com/news/vaccine-researcher-admits-big-mistake-says-spike-protein-is-dangerous-toxin>

- q) Defendants threatened medical doctors who prescribed widely available, safe and effective therapeutic medicines in furtherance of coercing the public to take the COVID-19 injections:

<https://www.reuters.com/article/us-health-coronavirus-usa-hydroxychloroqidUSKBN23B340>

- r) Defendants defrauded and coerced the public by knowingly failing to disclose scientific study results and facts as well as knowingly disseminating fraudulent information to the public:

<http://amsterdamnews.com/news/2020/dec/24/why-black-people-cannot-trust-pfizer-vaccine/>

- s) Defendants failed to provide notice of risks and the right of informed consent to the public (per Nuremberg Code):

<https://pubmed.ncbi.nlm.nih.gov/33113270/>

- t) sufficient evidence exists to support a determination that: 1) a bioweapon in the form of a spike protein created in Wuhan, China through GOF research was released into the civilian population; 2) for the purpose of or intent to cause a demand for COVID-19 injections; 3) irrespective of or with intent to diminish, disregard or subvert known and efficient, existing therapies; 4) with the intent to cause harm or without regard to the consequences of harm that was known or foreseeable to the users; 5) for purposes of injuring, harming, controlling or killing the users; 6) while Defendant stakeholders enjoy and/or enjoyed monetary or other economic, academic or political rewards.

<https://thetruthaboutvaccines.com/stop-damage-mrna-vaccines/>

## CONCLUSION

The overwhelming sum of information presented herein, much of it incontrovertible, offers more than sufficient probable cause to believe that one or more of the named Defendants has committed the offenses alleged in this Criminal Complaint, specifically mass murder through the commission of crimes against humanity. This complaint alleges that some or all of the Defendants did knowingly, intentionally, with malice aforethought and/or with reckless disregard for human life, some also in criminal conspiracy and others of willful ignorance, engaged in acts that:

- A) planned, coordinated, colluded and collaborated among two or more named and unnamed Defendants to design a criminal enterprise, taking steps in furtherance thereof for the purpose of:
- 1) creating the Covid 19 Virus as a Bio warfare weapon;
  - 2) enhancing the efficacy of the virus to further infect, contaminate and transmit among the global population for the purpose of killing human beings;
- B) orchestrated and implemented fraudulent acts, statements, public service announcements (PSA), publications, mandates and lockdowns in order to:
- 1) induce fear in and amongst an unsuspecting public, thus compelling compliance therewith, including the public's unwitting willingness to accept an injectable bioweapon / gene-therapy veiled as a vaccine;

- 2) diminish the knowledge, use and efficacy of existing therapeutic medicines for the purpose of limiting perceived treatments to the “vaccines” and / or the high-risk drug, Remdesivir;
  - 3) coerce, intimidate or force medical providers into compliance with non-legislated regulations, thus limiting their treatment options for infected patients, the consequences of which would often lead to hospitalization and often death.
- C) pre-planned the use and distribution of fraudulent, non-efficacious PCR tests for the purpose of creating false positive results, false narratives, false pretenses and false conditions about infection in order to terrorize, incite fear, intimidation and coercion in the general population in support of their sales, marketing and distribution of deadly Covid 19 Vaccines;
- D) conceived, created, manufactured, sold and distributed deadly Covid 19 Vaccines for the purpose of stimulating a well-known and established hyper or enhanced immune response in the victims and users of the experimental gene therapy injectables;
- E) falsified data and reports in scientific and news media publications regarding the safety and efficacy of the Covid 19 Vaccines for the purpose of hiding the deadly effects of the injectables;
- F) conspired with and among the many named and unnamed Defendants to use the aforementioned manipulation, tactics and coercion in furtherance of their economic benefit and genocidal pursuits;
- G) engaged in, conspired, coordinated and executed on this criminal homicidal enterprise for their pecuniary, economic, academic and / or political benefit as a plan to infect, inoculate and kill not less than 70% of the global population;

In particular, the evidenced elements of the crimes alleged herein are as follows:

**A. CRIMES AGAINST HUMANITY (18 USC § 2441(d)(1)(c)):**

- i) The act of a person who subjects, or conspires or attempts to subject, one or more persons within his custody or physical control to biological experiments without a legitimate medical or dental purpose and in so doing endangers the body or health of such person or persons.

**B. PROHIBITIONS WITH RESPECT TO BIOLOGICAL WEAPONS (18 USC § 175(a))**

- ii) Whoever knowingly develops, produces, stockpiles, transfers, acquires, retains, or possesses any [biological agent, toxin, or delivery system for use as a weapon](#), or

knowingly assists a foreign state or any organization to do so, 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 jurisdiction over an offense under this section committed by or against a [national of the United States](#).

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

### C. GENOCIDE

iv) Whoever, whether in time of peace or in time of war and with the specific intent to destroy, in whole or in [substantial part](#), a national, ethnic, racial, or [religious group](#) as such—

- (1) kills [members](#) of that group;
- (2) causes serious bodily injury to [members](#) of that group;
- (3) causes the permanent impairment of the mental faculties of [members](#) of the group through drugs, torture, or similar techniques;
- (4) subjects the group to conditions of life that are intended to cause the physical destruction of the group in whole or in part;
- (5) imposes measures intended to prevent births within the group; or
- (6) transfers by force children of the group to another group;
- (7) shall be punished as provided in subsection (b).

### D. WAR CRIMES AND CRIMES AGAINST HUMANITY (18 USC § 2442)

v) Whoever knowingly—

- (1) recruits, enlists, or conscripts a person to serve while such person is under 15 years of age in an armed force or group; or
- (2) uses a person under 15 years of age to participate actively in hostilities;

### E. MURDER (18 U.S. Code § 1111(a))

vi) Murder is the unlawful killing of a human being with malice aforethought. Every murder perpetrated by poison, lying in wait, or any other kind of willful, deliberate, malicious, and premeditated killing; or committed in the perpetration of, or attempt to perpetrate, any arson, escape, murder, kidnapping, treason, espionage, sabotage, aggravated sexual abuse or sexual abuse, [child abuse](#), burglary, or robbery; or perpetrated as part of a [pattern or practice of assault or torture](#) against a [child](#) or children; or perpetrated from a premeditated design unlawfully and maliciously to

effect the death of any human being other than him who is killed, is murder in the first degree.

**F. ATTEMPTED MURDER (18 U.S. Code § 1113)**

vii) Except as provided in [section 113 of this title](#), whoever, within the special maritime and territorial jurisdiction of the United States, attempts to commit murder or manslaughter, shall, for an attempt to commit murder be imprisoned not more than twenty years or fined under this title, or both, and for an attempt to commit manslaughter be imprisoned not more than seven years or fined under this title, or both.

**viii) CONSPIRACY TO MURDER (18 U.S. Code § 1117)**

ix) If two or more persons conspire to violate [section 1111](#), [1114](#), [1116](#), or [1119](#) of this title, and one or more of such persons do any overt act to effect the object of the conspiracy, each shall be punished by imprisonment for any term of years or for life.

**H. ASSAULT WITHIN MARITIME AND TERRITORIAL JURISDICTION (18 U.S. Code § 113)**

x) Whoever, within the special maritime and territorial jurisdiction of the United States, is guilty of an assault shall be punished as follows:

- (1) Assault with intent to commit murder or a violation of [section 2241](#) or [2242](#), by a fine under this title, imprisonment for not more than 20 years, or both.
- (2) Assault with intent to commit any felony, except murder or a violation of [section 2241](#) or [2242](#), by a fine under this title or imprisonment for not more than ten years, or both.
- (3) Assault with a dangerous weapon, with intent to do bodily harm, by a fine under this title or imprisonment for not more than ten years, or both.
- (4) Assault by striking, beating, or wounding, by a fine under this title or imprisonment for not more than 1 year, or both.
- (5) Simple assault, by a fine under this title or imprisonment for not more than six months, or both, or if the victim of the assault is an individual who has not attained the age of 16 years, by fine under this title or imprisonment for not more than 1 year, or both.
- (6) Assault resulting in serious bodily injury, by a fine under this title or imprisonment for not more than ten years, or both.
- (7) Assault resulting in substantial bodily injury to a spouse or intimate partner, a dating partner, or an individual who has not attained the age of 16 years, by a fine under this title or imprisonment for not more than 5 years, or both
- (8) Assault of a spouse, intimate partner, or dating partner by strangling, suffocating, or attempting to strangle or suffocate, by a fine under this title, imprisonment for not more than 10 years, or both.

Harris County  
State of Texas

**I. FRAUD IN CONNECTION WITH MAJOR DISASTER OR EMERGENCY BENEFITS (18 U.S. Code § 1040)**

x) Whoever, in a circumstance described in subsection (b) of this section, knowingly—

- (1) falsifies, conceals, or covers up by any trick, scheme, or device any material fact; or makes any materially false, fictitious, or fraudulent statement or representation, or
- (2) makes or uses any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or representation, in any matter involving any benefit authorized, transported, transmitted, transferred, disbursed, or paid in connection with a major disaster declaration under section 401 of the [Robert T. Stafford Disaster Relief and Emergency Assistance Act \(42 U.S.C. 5170\)](#) or an emergency declaration under section 501 of the [Robert T. Stafford Disaster Relief and Emergency Assistance Act \(42 U.S.C. 5191\)](#), or in connection with any procurement of property or services related to any emergency or major disaster declaration as a prime contractor with the United States or as a subcontractor or supplier on a contract in which there is a prime contract with the United States, shall be fined under this title, imprisoned not more than 30 years, or both.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

\_\_\_\_\_ (signature)  
Jack E. Boteler, Complainant, citizen and resident of Harris County in the State of Texas

Subscribed and sworn to before me at \_\_\_\_\_ (place), on this  
\_\_\_\_\_ day of \_\_\_\_\_, 2022

\_\_\_\_\_ (Notary Public)

Signed: \_\_\_\_\_

Sealed: \_\_\_\_\_