

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF LOUISIANA  
NEW ORLEANS DIVISION**

*Plaintiffs*

**LUKE FONTANA**

**Plaintiff,**

**v.**

**JOSEPH R. BIDEN, JR., in his official  
capacity as President of the United  
States of America**

**JOHN FORBES KERRY, in his individual  
and official capacity as U.S. Special  
Presidential Envoy for Climate**

**ANTHONY FAUCI, in his official and  
personal capacity**

**RALPH BARIC, in his official and personal  
capacity**

**CENTER FOR DISEASE CONTROL AND  
PREVENTION**

**WORLD HEALTH ORGANIZATION**

**UNITED STATES DEPARTMENT OF  
HEALTH AND HUMAN SERVICES**

**BILL AND MELINDA GATES  
FOUNDATION**

*Defendants*

**CIVIL ACTION NO. \_\_\_\_\_**

## **COMPLAINT FOR DECLARATORY RELIEF**

For its complaint, Plaintiff Luke Fontana (“LF”), by and through avers as follows:

1. Plaintiff, Luke Fontana, bring this action to vindicate the democracy of the United States. The powers of President Joseph R. Biden. of powers in the federal government, the most fundamental bulwark of our liberty. “Frequently,” a threat to the separation of powers “will come before the Court clad, so to speak, in sheep’s clothing.... But this wolf comes as a wolf.” *Morrison v. Olson*, 487 U.S. 654, 699 (1988) (Scalia, J., dissenting).
2. Setting the “social cost” and “economic cost” of stakeholder capitalism is an inherently speculative, policy-laden, and indeterminate task, which involves attempting to predict such unknowable contingencies as human migrations, international conflicts, and global catastrophes for hundreds of years into the future.
3. When the States ratified the Constitution, they ceded the power to regulate inter-state and international commerce to Congress, U.S. Const. art. I, § 8, cl. 3, which must act through the process of bicameralism and presentment. *Id.* § 7. This process may “often seem clumsy, inefficient, even unworkable,” but was designed to protect both the liberty and property of individuals and the prerogative of sovereign States. *See, e.g., I.N.S. v. Chadha*, 462 U.S. 919, 958-59 (1983). The President has certain prerogatives to act on behalf of the United States in foreign affairs. But as far as domestic law is concerned, the President must work with and abide by the limits set by Congress—whether he likes them or not.<sup>1</sup>
4. This Administration has sought to leverage its power regarding U.S. *foreign* policy to unilaterally contradict Congress’s stated *domestic* policy regarding one of
5. President Biden and John Kerry should be enjoined from leading this country to takeover by World Economic Forum’s Great Reset without a vote of Congress

## **JURISDICTION AND VENUE**

6. This Court has jurisdiction pursuant to 28 U.S.C. §§ 1331, 1361, and 2201(a). The action arises under the U.S. Constitution (art. I, § 1, art. II, § 1), 5 U.S.C. §§ 702-703, and other federal statutes. This Court also has jurisdiction under 28 U.S.C. § 1346(a) because this is a civil action against the United States.

7. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391(b)(2) and 1391(e). Defendants are United States agencies or officers sued in their official capacities. Defendant is a resident of this judicial district and a substantial part of the events or omissions giving rise to the Complaint occur within the Eastern District of Louisiana.
8. The Court is authorized to award the requested declaratory relief under 28 U.S.C. §§ 1361, 2201–02.

### **THE PARTIES**

9. Luke Fontana is an individual and attorney who has dedicated his life to defending the rights of all citizens, the constitution, and the democracy of this nation that he holds dear to him.
10. Defendant, Joseph R. Biden (“President Biden”), a natural person and President of the United States of America. He is being sued in his official capacity.
11. Defendant, John Forbes Kerry, a natural person and United States Special Envoy for Climate. He is being sued in his individual and official capacity.
12. World Health Organization (“WHO”) is a specialized agency of the United Nations responsible for international public health.
13. The WHO is part of the U.N. Sustainable Development Group, a consortium of 36 United Nations funds, programs, specialized agencies, departments and offices that play a role in development. It was created by the Secretary-General of the United Nations in order to improve the effectiveness of United Nations development activities at the country level.
14. The WHO maintains offices at the United Nations, 1 Dag Hammarskjold Plaza 885 Second Avenue, New York, N.Y. 10017.
15. Defendant, Center for Disease Control (“CDC”) is a component of the U.S. Department of Health and Human Services (“HHS”) and is agency
16. Defendant HHS is a department of the executive branch of the U.S. government.
17. Defendant, Anthony Fauci, a natural person. He is being sued in his individual and official capacity.

### **INTRODUCTION**

18. On or before, April 12, 2021 President Biden has conspired with others to undermine the democracy of America through “The Great Reset.”
19. The Great Reset is an initiative of the World Economic Forum (“WEC”) for resetting the global economy, the economic structure of countries, and the redistribution of wealth.
20. The Great Reset was unveiled at the WEC in Davos, Switzerland during the month of June 2020, using the coronavirus pandemic and “global warming” as pretexts to impose on the world far-left social programs like government-provided basic income, the Green New Deal, universal healthcare, and of course, massive tax increases.
21. Klaus Schwab, the founder and executive chairman of the World Economic Forum is the mastermind behind this radical plan. Klaus Schwab has written, ““Every country, from the United States to China, must participate, and every industry, from oil and gas to tech, must be transformed.”<sup>1</sup>
22. The Great Reset agenda would have three main components. The first would steer the market toward fairer outcomes. To this end, governments should improve coordination (for example, in tax, regulatory, and fiscal policy), upgrade trade arrangements, and create the conditions for a “stakeholder economy.” At a time of diminishing tax bases and soaring public debt, governments have a powerful incentive to pursue such action.
23. Moreover, governments should implement long-overdue reforms that promote more equitable outcomes. Depending on the country, these may include changes to wealth taxes, the withdrawal of fossil-fuel subsidies, and new rules governing intellectual property, trade, and competition.
24. The second component of a Great Reset agenda would ensure that investments advance shared goals, such as equality and sustainability. Here, the large-scale spending programs that many governments are implementing represent a major opportunity for progress. The European Commission, for one, has plans for a €750 billion (\$826 billion) recovery fund. The US, China, and Japan also have ambitious economic-stimulus plans.
25. Rather than using these funds, as well as investments from private entities and pension funds, to fill cracks in the old system, we should use them to create a new one that is more resilient,

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<sup>1</sup> Klaus Schwab, Now Is the Time for a 'Great Reset', World Economic Forum (June 3, 2020), <https://www.weforum.org/agenda/2020/06/now-is-the-time-for-a-great-reset/>

equitable, and sustainable in the long run. This means, for example, building “green” urban infrastructure and creating incentives for industries to improve their track record on environmental, social, and governance (ESG) metrics.

26. The third and final priority of a Great Reset agenda is to harness the innovations of the Fourth Industrial Revolution to support the public good, especially by addressing health and social challenges. During the COVID-19 crisis, companies, universities, and others have joined forces to develop diagnostics, therapeutics, and possible vaccines; establish testing centers; create mechanisms for tracing infections; and deliver telemedicine. Imagine what could be possible if similar concerted efforts were made in every sector.
27. In one week, Joe Biden has signed over 30 executive actions, a far-left wish list dealing with race issues, the Covid-19 pandemic, illegal immigration, “gender identity,” and the climate. Meanwhile, his Department of Justice and Department of Homeland Security have been focusing on punishing political enemies under the guise of combatting “violent extremism.”
28. The Great Reset is a totalitarian project of economic and social engineering is high on the Biden administration agenda.
29. The theme of the WEC 2020 meeting was “rebuilding society and the economy in a more sustainable way following the COVID-19 pandemic,” and the Great Reset’s supporters have been open about using it to fundamentally transform societies. <sup>2</sup>
30. Schwab who has written several books on his masterplan to “reset capitalism”. Schwab’s latest book Covid-19. The Great Reset Radical changes of such consequence are coming that some pundits have referred to a ‘before coronavirus’ (BC) and ‘after coronavirus’ (AC) era. We will continue to be surprised by both the rapidity and unexpected nature of these changes – as they conflate with each other, they will provoke second-, third-, fourth- and more-order consequences, cascading effects and unforeseen outcomes. <sup>3</sup>
31. This might all seem pie in the sky — the demented ravings of a German so sinister-looking and sounding that he would have made an excellent Blofeld in the Bond movies — were it not for one major problem: lots of world leaders, billionaire businessmen and other masters

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<sup>2</sup> Debra Heine, Biden Regime Embraces ‘Great Reset’ Plan to Destroy Capitalism- the Ohio Star, Path of Ex (Jan. 30, 2021), <https://pathofex.com/biden-regime-embraces-great-reset-plan-to-destroy-capitalism-the-ohio-star/>

<sup>3</sup> Klaus Schwab, COVID-19 the Great Reset

of the universe are totally onboard with the project, including President of the United States, Joseph R. Biden.

32. In three open letters to President Trump last year, Vatican whistleblower Archbishop Carlo Maria Vigano, former papal nuncio to the United States, warned that The Great Reset would usher in a “one world government,” eliminating the sovereignty of nations and crushing religious freedom.
33. In his October letter, Vigano wrote that the global élite were trying to “subdue all of humanity, imposing coercive measures with which to drastically limit individual freedoms and those of entire populations.”
34. The purpose of the Great Reset, Vigano argued, was to usher in “a health dictatorship” using “tempting promises” such as a guaranteed universal income and the canceling of individual debt. <sup>4</sup>
35. Kerry later argued that the Great Reset is necessary to slow the “climate crisis” and that Joe Biden believes... it’s not enough just to rejoin Paris [the Paris Climate Accords] for the United States. It’s not enough for us just to do the minimum of what Paris requires.
36. Kerry also said that because of the Great Reset movement, he believes “we are the dawn of an extremely exciting time” and that “the greatest opportunity we have” to address social and economic problems is “dealing with the climate crisis.” <sup>5</sup>
37. Justin Haskins, the Editorial Director at The Heartland Institute and a leading authority on the Great Reset, “Fundamentally, this is a radical and complete transformation of everything that we do in our society,” Haskins adds, “It will change the way businesses are evaluated, it will coerce businesses to pursue left-wing causes.” <sup>2</sup>
38. If the policies and objectives of the Great Reset are not restrained from undermining our democracy, this is a small classic of the prose of soft authoritarianism that President Biden will usher us into as Americans. This “urgent need” that must be met. The cooperation and

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<sup>4</sup> Carlo Maria Vigano, Archbishop of Ulpiana, Open Letter to President Donald Trump(2020) (unpublished manuscript) (on file with )

<sup>5</sup> National Institute of Health, [Studies Into The Mechanisms For MHV Replication, Project Number 5R01ai023946-12](https://reporter.nih.gov/search/nnPqam0QUqhkS6Qhxd03Q/project-details/6169887), NIH RePorter Project Details, <https://reporter.nih.gov/search/nnPqam0QUqhkS6Qhxd03Q/project-details/6169887>

management dictated in the Great Reset that will be put in place by “global stakeholders,” will bypass the democracy of the United States.

### **THE COVID-19 CATALYST**

39. On or before May 21, 2001, the National Institute of Health (“NIH”) issued Grant AI23946-08 to Dr. Ralph Baric at the University of North Carolina at Chapel Hill (“UNC”). Dr. Baric was part of the Public Health & Preventive Medicine. On or about July 2001, the National Institute of Allergy and Infectious Diseases (“NIAID”) became affiliated with Dr. Baric. Dr. Anthony Fauci began his tenor as the Director of the NAID on November 2, 1984.<sup>6</sup>
40. Dr. Baric began the work on synthetically altering the *Coronaviridae* (the coronavirus family) for the express purpose of general research, pathogenic enhancement, detection, manipulation, and potential therapeutic interventions targeting the same. As early as May 1, 2000 Dr. Baric and UNC sought to patent critical sections of the coronavirus family for their commercial benefit.<sup>7</sup>
41. “Using a panel of contiguous cDNAs that span the entire genome, we have assembled a full-length cDNA of the SARS-CoV Urbani strain, and have rescued molecularly cloned SARS
42. viruses (infectious clone SARS-CoV) that contained the expected marker mutations inserted into the component clones.”<sup>8</sup>
43. On April 19, 2002 – the Spring before the first SARS outbreak in Asia – Christopher M. Curtis, Boyd Yount, and Ralph Baric filed an application for U.S. Patent 7,279,372 for a method of producing recombinant coronavirus. In the first public record of the claims, they

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<sup>6</sup> University of North Carolina at Chapel Hill, US Patent for Directional Assembly of Large Viral Genomes and Chromosomes Patent (Patent # 6,593,111), Recombinant Dna Technique Included in Method of Making A Protein or Polypeptide, Justia Patents (May 21, 2001), <https://patents.justia.com/patent/6593111>

<sup>7</sup> Boyd Yount, Kristopher M. Curtis, Elizabeth A. Fritz, Lisa E. Hensley, Peter B. Jahrling, Erik Prentice, Mark R. Denison, Thomas W. Geisbert, and Ralph S. Baric, Reverse Genetics with a Full-Length Infectious cDNA of Severe Acute Respiratory Syndrome Coronavirus, PNAS- Proceedings of the National Academy of Sciences of the United States of America (Oct. 28, 2003), <https://www.pnas.org/content/100/22/12995>

<sup>8</sup>Curtis, K. M., Yount, B., & Baric, R. S. (2007). *U.S. Patent No. 7,279,327*. Washington, DC: U.S. Patent and Trademark Office.

sought to patent a means of producing, “an infectious, replication defective, coronavirus.”<sup>9</sup> This work was supported by the NIH grant AI23946-08 and GM63228. In short, the U.S. Department of Health and Human Services was involved in the funding of amplifying the infectious nature of coronavirus between 1999 and 2002 before SARS was ever detected in humans.

44. Against, this backdrop, we noted the unusual patent prosecution efforts of the CDC, when on April 25, 2003, they sought to patent the SARS coronavirus isolated from humans that had reportedly transferred to humans during the 2002-2003 SARS outbreak in Asia. 35 U.S.C. §101 prohibits patenting nature. Inventions Patentable, 35 U.S.C. § 101 states Whoever invents or discovers any new and useful process, machine, manufacture, or composition of matter, or any new and useful improvement thereof, may obtain a patent therefor, subject to the conditions and requirements of this title.
45. This legality did not deter CDC in their efforts. Their application, updated in 2007, ultimately issued as U.S. Patent 7,220,852 (“CDC Patent”) and constrained anyone not licensed by their patent from manipulating SARS CoV, developing tests or kits to measure SARS coronavirus in humans or working with their patented virus for therapeutic use. Work associated with this virus by their select collaborators included considerable amounts of chimeric engineering, gain-of-function studies, viral characterization, detection, treatment (both vaccine and therapeutic intervention), and weaponization inquiries.
46. Dr. Ralph Baric, was the recipient of millions of dollars of funding from the United States government with majority administered by the NIAD. Dr. Ralph Baric sat on the WHO’s International Committee of Taxonomy of Viruses (ICTV) and the *Coronaviridae* Study Group (CSG). In this capacity, he was both responsible for determining “novelty” of clades of virus species but directly benefitted from determining declarations of novelty in the form

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<sup>9</sup> Rota, P. A., Anderson, L. J., Bellini, W. J., Burns, C. C., Chen, Q., Comer, J. A., Emery, S. L., Erdman, D. D., Goldsmith, C. S., Humphrey, C. D., Icenogle, J. P., Ksiazek, T. G., Monroe, S. S., Nix, W. A., Oberste, M. S., Peret, T. C., Rollin, P. E., Pallansch, M. A., Sanchez, A., Tong, S., & Zaki, S. R. (2004). *U.S. Patent No. 7,220,852*. Washington, DC: U.S. Patent and Trademark Office.



47. of new research funding authorizations and associated patenting and commercial collaboration. Together with CDC, NIAID, WHO, academic and commercial parties (including Johnson & Johnson; Sanofi and their several coronavirus patent holding biotech companies; Moderna; Ridgeback; Gilead; Sherlock Biosciences; and, others).
48. These entities also were affiliated with the WHO's Global Preparedness Monitoring Board (GPMB) whose members were instrumental in the Open Philanthropy-funded global coronavirus pandemic "desk-top" exercise EVENT 201 in October 2019. This event, funded by the principal investor in Sherlock Biosciences and linking interlocking funding partner, the Bill and Melinda Gates Foundation into the GPMB mandate for a respiratory disease global preparedness exercise to be completed by September 2020 alerted us to anticipate an "epidemic" scenario. We expected to see such a scenario emerge from Wuhan or Guangdong China, northern Italy, Seattle, New York or a combination thereof, as Dr. Zhengli Shi and Dr. Baric's work on zoonotic transmission of coronavirus identified overlapping mutations in coronavirus in bat populations located in these areas.

**18 U.S.C. §2331**

**US PATRIOT ACT SECTION 802**

**ACTS OF DOMESTIC TERRORISM RESULTING IN THE DEATH OF  
AMERICAN CITIZENS**

49. Dr. Anthony Fauci has intimidated and coerced a civilian population and sought to influence the policy of a government by intimidation and coercion. With no corroboration, Dr. Anthony Fauci promoted Professor Neil Ferguson's computer simulation derived claims that, "The world is facing the most serious public health crisis in generations. Here we provide concrete estimates of the scale of the threat countries now face. "We use the latest estimates of severity to show that policy strategies which aim to mitigate the epidemic might halve deaths and reduce peak healthcare demand by two-thirds, but that this will not be enough to prevent health systems being overwhelmed. More intensive, and socially disruptive interventions will therefore be required to suppress transmission to low levels. It is likely such measures – most notably, large scale social distancing – will need to be in place for many months, perhaps until a vaccine becomes available."

50. Reporting to the President that as many as 2.2 million deaths may result from a pathogen that had not yet been isolated and could not be measured with any accuracy, Dr. Fauci intimidated and coerced the population and the government into reckless, untested, and harmful acts creating irreparable harm to lives and livelihoods.
51. Neither the Imperial College nor the “independent” Institute for Health Metrics and Evaluation (principally funded by the Bill and Melinda Gates Foundation) had any evidence of success in estimating previous burdens from coronavirus but, without consultation or peer-review, Dr. Fauci adopted their terrifying estimates as the basis for interventions that are explicitly against medical advice.
52. Insisting on vaccines while blockading the emergency use of proven pharmaceutical interventions may have contributed to the death of many patients and otherwise healthy individuals. Using the power of NIAID during the alleged pandemic, Dr. Anthony Fauci actively suppressed proven medical countermeasures used by, and validated in scientific proceedings, that offered alternatives to the products funded by his conspiring entities for which he had provided direct funding and for whom he would receive tangible and intangible benefit.

**15 U.S.C. §1**

**CONSPIRING TO COMMIT CRIMINAL COMMERCIAL ACTIVITY**

53. Every contract, combination in the form of trust or otherwise, or conspiracy, in restraint of trade or commerce among the several States, or with foreign nations, is declared to be illegal. Every person who shall make any contract or engage in any combination or conspiracy hereby declared to be illegal shall be deemed guilty of a felony, and, on conviction thereof, shall be punished by fine not exceeding \$100,000,000 if a corporation, or, if any other person, \$1,000,000, or by imprisonment not exceeding 10 years, or by both said punishments, in the discretion of the court. 15 U.S.C. 1§
54. The National Institute of Health’s grant AI23946-08 issued to Dr. Ralph Baric at the University of North Carolina at Chapel Hill (officially classified as affiliated with Dr. Anthony Fauci’s NIAID by at least 2003) began the work on synthetically altering the *Coronaviridae* (the coronavirus family) for the express purpose of general research, pathogenic enhancement, detection, manipulation, and potential therapeutic interventions

targeting the same. As early as May 21, 2000, Dr. Baric and UNC sought to patent critical sections of the coronavirus family for their commercial benefit.

55. In one of the several papers derived from work sponsored by this grant, Dr. Baric published what he reported to be the full-length cDNA of SARS CoV in which it was clearly stated that SAR CoV was based on a composite of DNA segments.
56. “Using a panel of contiguous cDNAs that span the entire genome, we have assembled a full-length cDNA of the SARS-CoV Urbani strain and have rescued molecularly cloned SARS viruses (infectious clone SARS-CoV) that contained the expected marker mutations inserted into the component clones.”<sup>9</sup>
57. On April 19, 2002 – the Spring before the first SARS outbreak in Asia – Christopher M. Curtis, Boyd Yount, and Ralph Baric filed an application for U.S. Patent 7,279,327<sup>8</sup> for a method of producing recombinant coronavirus. In the first public record of the claims, they sought to patent a means of producing, “an infectious, replication defective, coronavirus.” This work was supported by the NIH grant referenced above and GM63228. In short, the U.S. Department of Health and Human Services was involved in the funding of amplifying the infectious nature of coronavirus between 1999 and 2002 before SARS was ever detected in humans.
58. Against this backdrop, we noted the unusual patent prosecution efforts of the CDC, when on April 25, 2003, they sought to patent the SARS coronavirus isolated from humans that had reportedly transferred to humans during the 2002-2003 SARS outbreak in Asia. 35 U.S.C. §101 prohibits patenting nature. This legality did not deter CDC in their efforts. Their application, updated in 2007, ultimately issued as U.S. Patent 7,220,852 and constrained anyone not licensed by their patent from manipulating SARS CoV, developing tests or kits to measure SARS coronavirus in humans or working with their patented virus for therapeutic

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<sup>10</sup>Alexander LK, Small JD, Edwards S, Baric RS. An experimental model for dilated cardiomyopathy after rabbit coronavirus infection. *J Infect Dis.* 1992 Nov;166(5):978-85. doi: 10.1093/infdis/166.5.978. PMID: 1328411; PMCID: PMC7109931.

<sup>12</sup> Miller, T. J., Klepfer, S., Reed, A. P., & Jones, E. V. (2002). *U.S. Patent No. 6372224*. Washington, DC: U.S. Patent and Trademark Office.

<sup>13</sup> Baric RS, Fu K, Chen W, Yount B. High recombination and mutation rates in mouse hepatitis virus suggest that coronaviruses\ may be potentially important emerging viruses. *Adv Exp Med Biol.* 1995;380:571-6. doi: 10.1007/978-1-4615-1899-0\_91. PMID: 8830544.

use. Work associated with this virus by their select collaborators included considerable amounts of chimeric engineering, gain-of-function studies, viral characterization, detection, treatment (both vaccine and therapeutic intervention), and weaponization inquiries.

59. We noted that gain-of-function specialist, Dr. Ralph Baric, was both the recipient of millions of dollars of U.S. research grants from several federal agencies but also sat on the World Health Organization’s International Committee on Taxonomy of Viruses (ICTV) and the Coronaviridae Study Group (CSG). In this capacity, he was both responsible for determining “novelty” of clades of virus species but directly benefitted from determining declarations of novelty in the form of new research funding authorizations and associated patenting and commercial collaboration. Together with CDC, NIAID, WHO, academic and commercial parties (including Johnson & Johnson; Sanofi and their several coronavirus patent holding biotech companies; Moderna; Ridgeback; Gilead; Sherlock Biosciences; and, others), a powerful group of interests constituted what we would suggest are “interlocking directorates” under U.S. anti-trust laws.

**CHRONOLOGICAL TIMELINE OF COMMERCIAL CONSPIRACY**  
**“THE GREAT RESET CATALYST”**

DATE	ACT
1986-1990	NIAID Grant AI 23946 leading to patent U.S. 7,279,327 “Methods for Producing Recombinant Coronavirus” Filed 2002 and issued 2007 <sup>8 10</sup>
1990	Pfizer files U.S. Patent 6,372,224 on a vaccine for the S-protein on coronavirus November 14, 2000 which was abandoned April 2010 making it public domain. <sup>12</sup>
1990s	Early reference to the “emergence of CoV as a <i>respiratory pathogen</i> in paper published by Baric <sup>13</sup>

<sup>14</sup> Rota, P. A., Anderson, L. J., Bellini, W. J., Bowen, M. D., Burns, C. C., Campagnoll, R., Chen, Q., Comer, J. A., Cook, B. T., Emery, S. L., Erdman, D. D., Goldsmith, C. S., Guarner, J., Humphrey, C. D., Icenogle, J. P., Ksiazek, T. G., Myer, R. F., Monroe, S. S., Nix, W. A., Oberste, M. S., Paddock, C. D., Peret, T. C., Rollin, P. E., Pallansch, M. A., Sanchez, A., Shich, W., Tong, S., & Zaki, S. R. (2010). *U.S. Patent No. 7776521*. Washington, DC: U.S. Patent and Trademark Office.

<sup>15</sup> Benjamin Mateus, Executives of Vaccine Developer Moderna Cash In, Cut Corners, World Socialist Web Site (May 26, 2020), <https://www.wsws.org/en/articles/2020/05/26/vacc-m26.html>

2000	Ralph Baric AI23946 and GM63228 from the National Institutes of Health actively working recombinant CoV
2001	National Institute of Health, Allergy and Infectious diseases. “Reverse Genetics with a Coronavirus Infectious cDNA Construct.” 4/1/2001-3/31/005 \$1.0 million total costs/yr. RS Baric, PI
2002	Asia CoV SARS outbreak
2003	April 25, 2003 CDC Patent filed and ultimately becomes US7,220,852 <sup>9</sup> (the patent on the RNA sequence) and 7,776,521 <sup>14</sup> (the patent on the testing methodology. These patents give the U.S. Department of Health and Human Services the ability to control the commercial exploitation of SARS coronavirus.
	Dr. Anthony Fauci appointed to the Bill and Melinda Gates Foundation’s Global Grand Challenges Scientific Advisory Board (served through 2010).
April 28, 2003	Sequoia Pharmaceuticals \$953K for pathogen response and patent
July 21, 2003	July 21, 2003 Ralph Baric’s team (using AI23946 and GM63228) file U.S. Patent 7,618,802 which issued on November 17, 2009.

<sup>18</sup> Lindsay Brownell, Sherlock Biosciences Licenses Wyss Technology to Create Affordable Molecular Diagnostics, Wyss Institute (Mar. 21, 2019), <https://wyss.harvard.edu/news/sherlock-biosciences-licenses-wyss-technology-to-create-affordable-molecular-diagnostics/>

<sup>19</sup> Andrew Stuttaford, John Kerry, Davos, and the ‘Great Reset’, National Review (Jan. 27, 2021), <https://www.nationalreview.com/corner/john-kerry-davos-and-the-great-reset/>

<sup>20</sup> Vincent MJ, Bergeron E, Benjannet S, et al. Chloroquine is a potent inhibitor of SARS coronavirus infection and spread. *Virology*. 2005;2:69. Published 2005 Aug 22. doi:10.1186/1743-422X-2-69

<sup>21</sup> Ge XY, Li JL, Yang XL, Chmura AA, Zhu G, Epstein JH, Mazet JK, Hu B, Zhang W, Peng C, Zhang YJ, Luo CM, Tan B, Wang N, Zhu Y, Cramer G, Zhang SY, Wang LF, Daszak P, Shi ZL. Isolation and characterization of a bat SARS-like coronavirus that uses the ACE2 receptor. *Nature*. 2013 Nov 28;503(7477):535-8. doi: 10.1038/nature12711. Epub 2013 Oct 30. PMID: 24172901; PMCID: PMC5389864.

<sup>22</sup> Klaus Schwab, World Economic Forum, Now Is the Time for a ‘Great Reset’, <https://www.weforum.org/agenda/2020/06/now-is-the-time-for-a-great-reset/> ( June 3, 2020)

<sup>23</sup> Tim Hinchcliffe, A Skeptical Look at the ‘Great Reset’: A Technocratic Agenda That Waited Years for a Global Crisis to Exploit, How The ‘Great Reset’ Ideology of Un-Elected Bureaucrats Would Steer Society Towards Massive Surveillance & Control: Perspective, The Sociable (Nov. 2, 2020), <https://sociable.co/technology/skeptical-great-reset-technocratic-agenda-waited-years-crisis-exploit/>

<sup>24</sup> Hilary Sutcliffe, COVID-19: The 4 Building Blocks of the Great Reset, World Economic Forum (Aug. 11, 2020),

January 6, 2004	SARS and Bioterrorism linked at Bioterrorism and Emerging Infectious Diseases: antimicrobials, therapeutics and immune modulators. <a href="https://tks.keystonesymposia.org/index.cfm?e=web.meeting.program&amp;meetingid=706">https://tks.keystonesymposia.org/index.cfm?e=web.meeting.program&amp;meetingid=706</a>
2008	Biodefense Grant U54 AI057157 commences with \$10,189,682 to UNC Chapel Hill
2015	Moderna signs a vaccine development agreement with NIAID and executes it with the lead on the mRNA-1273 lead developer and inventor Giuseppe Ciaramella (See Exhibit 1)
2016	NIH through Scripps Institute and Dartmouth College file patent application WO 2018081318A1 “Prefusion Coronavirus Spike Proteins and their Use” disclosing mRNA technology that overlaps (and issued in tandem with) Moderna’s technology. (See Exhibit 2)  Lead Inventor Barney Scott Graham was well known to Moderna as he’s the person at NIH that Moderna “e-mailed” to get the sequence for SARS-CoV-2 according to Moderna’s report here  In January 2020, once it was discovered that the infection in Wuhan was caused by a novel coronavirus, Stephen Bancel, CEO of Moderna quickly emailed Dr. Barney Graham, Deputy director of the Vaccine Research Center at the National Institutes of Health, asking him to send the genetic sequence for the virus. <sup>15</sup>
2019	Sherlock Biosciences funded by Open Philanthropy – the same organization that would be the financial sponsor of the Event 201 “table-top” exercise that laid out the entire “pandemic” plan in October 2019. <sup>18</sup>

<sup>25</sup> Ceri Parker, 8 Predictions for the World in 2030, World Economic Forum (Nov. 12, 2016), <https://www.weforum.org/agenda/2016/11/8-predictions-for-the-world-in-2030/>

<sup>27</sup> Max Roser, Human Development Index, Our World in Data, <https://ourworldindata.org/human-development-index> (last modified Nov. 2019)

<sup>28</sup> New Economics Foundation, Happy Planet Foundation, New Economics Foundation, <http://happyplanetindex.org/countries/united-states-of-america>

<sup>29</sup> Jack Houghton, Dangerous Marxist Leaders Call for ‘The Great Reset’ to Destroy Capitalism, Sky News Australia (May 8, 2020), <https://www.skynews.com.au/details/6178243325001>

60. The events in the timeline demonstrate that Fauci and Baric were in coercion for several decades on the creation and patenting of the COVID-19 virus. The COVID-19 epidemic is the catalyst needed for the WEC's Great Reset plan to seduce the public into acceptance.
61. COVID-19 that was engineered by Fauci, Baric, and other unnamed conspirators is the excuse needed to renew Schwab's longstanding campaign to replace free market capitalism with "stakeholder capitalism". Stakeholder capitalism is expression of corporatism, an ideology that is almost infinitely malign: It was, to varying degrees an important part of fascism in the interwar years and, in countries such as Spain, Portugal, and Argentina, for much longer still.
62. Kerry has firmly declared that the Biden administration will support the Great Reset and that the Great Reset "will happen with greater speed and with greater intensity than a lot of people might imagine."<sup>19</sup>

**18 U.S.C. §2339 C**

**Funding and Conspiring to Commit Acts of Terror**

63. Indirectly, unlawfully and willfully provides or collects funds with the intention that such funds be used, or with the knowledge that such funds are to be used, in full or in part, in order to carry out— (A) an act which constitutes an offense within the scope of a treaty specified in subsection (e)(7), as implemented by the United States, or (B) any other act intended to cause death or serious bodily injury to a civilian, or to any other person not taking an active part in the hostilities in a situation of armed conflict, when the purpose of such act,
64. by its nature or context, is to intimidate a population, or to compel a government or an international organization to do or to abstain from doing any act.
65. By no later than April 11, 2005, Dr. Anthony Fauci was publicly acknowledging the association of SARS with bioterror potential. Leveraging the fear of the anthrax bioterrorism of 2001, he publicly celebrated the economic boon that domestic terror had directed towards his budget. He specifically stated that NIAID was actively funding research on a "SARS Chip" DNA microarray to rapidly detect SARS (something that was not made available during the current "pandemic") and two candidate vaccines focused on the SARS CoV spike protein.<sup>7</sup> Led by three Chinese researchers under his employment – Zhi-yong Yang, Wing-

pui Kong, and Yue Huang – Fauci had at least one DNA vaccine in animal trials by 2004.

8. This team, part of the Vaccine Research Center at NIAID, was primarily focused on HIV vaccine development but was tasked to identify SARS vaccine candidates as well. Working in collaboration with Sanofi, Scripps Institute, Harvard, MIT and NIH, Dr. Fauci's decision to unilaterally promote vaccines as a primary intervention for several designated "infectious diseases" precluded proven therapies from being applied to the sick and dying.<sup>20</sup>

66. The CDC and NIAID led by Anthony Fauci entered into trade among States (including, but not limited to working with EcoHealth Alliance Inc.) and with foreign nations (specifically, the Wuhan Institute of Virology and the Chinese Academy of Sciences) through the 2014 et seq National Institutes of Health Grant R01AI110964 to exploit their patent rights. This research was known to involve surface proteins in coronavirus that had the capacity to directly infect human respiratory systems. In flagrant violation of the NIH moratorium on gain of function research, NIAID and Ralph Baric persisted in working with chimeric coronavirus components specifically to amplify the pathogenicity of the biologic material.

67. By October 2013, the Wuhan Institute of Virology 1 coronavirus S1 spike protein was described in NIAID's funded work in China. This work involved NIAID, USAID, and Peter Daszak, the head of EcoHealth Alliance. This work, funded under R01AI079231, was pivotal in isolating and manipulating a bat SARS-like coronavirus that uses the ACE2 receptor.<sup>21</sup>

68. By March 2015, both the virulence of the S1 spike protein and the ACE II receptor was known to present a considerable risk to human health. NIAID, EcoHealth Alliance and numerous researchers lamented the fact that the public was not sufficiently concerned about coronavirus to adequately fund their desired research (See Exhibit 3) The CDC and NIAID entered into trade among States (including, but not limited to working with University of North Carolina, Chapel Hill) and with foreign nations (specifically, the Wuhan Institute of Virology and the Chinese Academy of Sciences represented by Zheng-Li Shi) through U19AI109761 (Ralph S. Baric), U19AI107810 (Ralph S. Baric), and National Natural Science Foundation of China Award 81290341 (Zheng-Li Shi) et al. 2015-2016.

69. These projects took place during a time when the work being performed was prohibited by the United States National Institutes of Health. The conspirators took their "dirty acts" to China where such behavior is outside realm of the United States.



70. The public was clearly advised of the dangers being presented by NIAID-funded research by 2015 and 2016 when the Wuhan Institute of Virology material was being manipulated at UNC in Ralph Baric's lab. "The only impact of this work is the creation, in a lab, of a new, non-natural risk," agrees Richard Ebright, a molecular biologist and biodefence expert at Rutgers University in Piscataway, New Jersey.
71. Both Ebright and Wain-Hobson are long-standing critics of gain-of-function research. In their paper, the study authors also concede that funders may think twice about allowing such experiments in the future. "Scientific review panels may deem similar studies building chimeric viruses based on circulating strains too risky to pursue," they write, adding that discussion is needed as to "whether these types of chimeric virus studies warrant further investigation versus the inherent risks involved".
72. But Baric and others say the research did have benefits. The study findings "move this virus from a candidate emerging pathogen to a clear and present danger", says Peter Daszak, who co-authored the 2013 paper. Daszak is president of the EcoHealth Alliance, an international network of scientists, headquartered in New York City, that samples viruses from animals and people in emerging-diseases hotspots across the globe.
73. Studies testing hybrid viruses in human cell culture and animal models are limited in what they can say about the threat posed by a wild virus, Daszak agrees. But he argues that they can help indicate which pathogens should be prioritized for further research attention.
74. Knowing that the U.S. Department of Health and Human Services (through CDC, NIH, NIAID, and their funded laboratories and commercial partners) had patents on each proposed element of medical counter measures and their funding, Dr. Fauci, Dr. Gao (China CDC), and Dr. Elias (Bill and Melinda Gates Foundation) conspired to commit acts of terror on the global population – including the citizens of the United States – when, in September 2019, they published the following mandate:
75. "Countries, donors and multilateral institutions must be prepared for the worst. A rapidly spreading pandemic due to a lethal respiratory pathogen (whether naturally emergent or accidentally or deliberately released) poses additional preparedness requirements. Donors and multilateral institutions must ensure adequate investment in developing innovative vaccines and therapeutics, surge manufacturing capacity, broad-spectrum antivirals and appropriate nonpharmaceutical interventions. All countries must develop a system for

immediately sharing genome sequences of any new pathogen for public health purposes along with the means to share limited medical countermeasures across countries.

76. On or about October 22, 2014, the U.S. government ceased funding gain-of-function studies such as the coronavirus viruses created by Baric as Fauci's front man. The latest study was already underway and was deemed safe by Baric. The NIH concluded that the work was not so risky as to fall under the U.S. government's moratorium.<sup>20</sup>

### **The Great Reset False Utopia**

77. The World Economic Forum has been promoting their utopia propaganda in early as November 11, 2016 in an article titled "Here's how life could change in my city by the year 2030" which is published on the WEC's website weforum.org. "Welcome to the year 2030. Welcome to my city - or should I say, "our city". I don't own anything. I don't own a car. I don't own a house. I don't own any appliances or any clothes." Exhibit 4
78. Communism can be summed up into one single sentence: Abolition of private property.<sup>29</sup>
79. In the face of a global pandemic, an un-elected body of global bureaucrats based in Davos, Switzerland has asked the world to trust its vision of a technocratic and autocratic "Great Reset," knowing that the public would never go for such a mandate of economic change had it not been for the golden opportunity they'd all been waiting for which is the novel COVID-
80. Klaus Schwab ("Schwab"), head of the World Economic Forum announced in June 2020 that "Now is the time for a great reset," It was not the first time he called for the Great Reset.<sup>22</sup>
81. Schwab called on the WEC to start a Great Reset over five years ago, but this year he states that COVID-19 is the most urgent reason for restricting all of society and the global economy.
82. "The pandemic represents a rare but narrow window of opportunity to create a healthier, more equitable, and more prosperous future"- Klaus Schwab, WEF
83. In June 2020, Prince Charles praised the Great Reset agenda for its potential to "make people more receptive to big visions of change" after having suffered through "unprecedented shockwaves."<sup>23</sup>
84. Would the idea of being forced to electronically prove your current health status in order to travel or even leave your own home have been acceptable 18 months ago?

85. The WEC through its Great Reset agenda wants to create new metrics for measuring what matters explicitly the GDP (Gross Domestic Product) measurement.

(A) According the WEC GDP measures the wrong things. Measuring the right things will give governments, business and citizens the knowledge they need to take the brave and challenging steps required to move to a more people- and planet-centered way of living.

(B) The WEC belief is that the GDP measurement fails on so many levels – it measures wealth and ignores its distribution. It fails to even register the human and financial costs of capitalism, “externalities” such as social welfare, environmental degradation and the social, mental and physical health costs of innovations.<sup>24</sup>

(C) The Great Reset will change our country from a capitalist free society where business and trade are based on earnings and revenue to a communist economic regime.

(D) GDP is a monetary measurement of the market value of all final goods and services produced in a specific time period. After the Bretton Woods conference in 1944, GDP became the main tool to measure the economy. The United States has been the world’s largest national economy in terms of GDP since the 1920s.<sup>25</sup>

(E) Replacing GDP with a communist idea of the UN’s Human Development and Social Development Indexes, WellBeing metrics, and Genuine Progress Indicators, a Happy Planet Index and an initiative to use Gross National Happiness.

(F) These indexes that the WEC’s Great Reset proposes to use as a measurement for a country’s performance compared to other countries would rank the United States in the lower percentile in every index.

1) 2017 Human Development Index Rank the United States Ranks #13<sup>27</sup>

2) The Happy Planet Index Ranks the United States #108 of 140. The United States Ecological Footprint Ranking is #137 out of 140.<sup>28</sup>

86. WEC leader, Klaus Schwab who is calling for a return to Marxist principles, claiming that capitalism has empirically failed. Klaus Schwab who is calling for a return to Marxist principles, claiming that capitalism has empirically failed. Schwab has just released a book titled The Great Reset and has dedicated large portion of the WEF website to such articles as “Does capitalism need some Marxism to survive the Fourth Industrial Revolution?”.

It's terrifying that President Biden would be so willingly engage with Schwab's "Great Reset" which is a return of the deadliest social experiments of the 20<sup>th</sup> century. The deadliest social experiment being Communism. Schwab states "There is an urgent need for a global stakeholders to cooperate in simultaneously managing the direct consequences of the COVID-19 crisis. "Drawing from the vision and vast expertise of the leaders engaged across the WEC's communities, the Great Reset initiative has a set of dimensions to build a new social contract that honors dignity of every human being." "The growing discontent at the ideology that has created so much wealth and progress on the one hand, and yet so much inequality and instability on the other hand, is causing increasingly frequent social disruptions across the world. "The COVID-19 crisis has laid bare most of these dysfunctions, ranging from uneven access to healthcare, education, economic opportunities, and social progress, to growing inequality among and within nations and racial and ethnic groups. At the center of these multiple crises lies the tension between privilege and meritocracy."<sup>29</sup>

### **COMMUNIST CONTROL ACT**

#### **50 USC 23 IV §841**

87. The Congress finds and declares that the Communist Party of the United States, although purportedly of a political party, is in fact an instrumentality of a conspiracy to overthrow the Government of the United States. It constitutes an authoritarian dictatorship within a republic, demanding for itself the rights and privileges accorded to political parties, but denying to all others the liberties guaranteed by the Constitution. Unlike political parties, which evolve their policies and programs through public means, by the reconciliation of a wide variety of individual views and submit those policies and programs to the electorate at large for approval or disapproval, the policies and programs of the Communist Party are secretly prescribed for it by the foreign leaders of the world Communist movement. Its members have no part in determining its goals and are not permitted to voice dissent to party objectives. Unlike members of political parties, members of the Communist Party are recruited for indoctrination with respect to its objectives and methods, and are organized, instructed, and disciplined to carry into action slavishly the assignments given them by their hierarchical chieftains. Unlike political parties, the Communist Party acknowledges no

constitutional or statutory limitations upon its conduct or upon that of its members. The Communist Party is relatively small numerically and gives scant indication of capacity ever to attain its ends by lawful political means. The peril inherent in its operation arises not from its numbers, but from its failure to acknowledge any limitation as to the nature of its activities, and its dedication to the proposition that the present constitutional Government of the United States ultimately must be brought to ruin by any available means, including resort to force and violence. Holding that doctrine, its role as the agency of a hostile foreign power renders its existence a clear present and continuing danger to the security of the United States. It is the means whereby individuals are seduced into the service of the world Communist movement, trained to do its bidding, and directed and controlled in the conspiratorial performance of their revolutionary services.

88. Kerry has repeatedly made public statements of President Biden's support of the WEC's Great Reset Agenda which is the modern-day Communist takeover. The threat today is not the Soviet Union, but the World Economic Forum. President Biden by engaging with Great Reset will leave the United States beholden to a hostile foreign power, the WEC, which is the wolf in the sheep's clothing.

### **COMMUNIST ACTION ORGANIZATION**

#### **USC 23.50 IV §843. Application of Internal Security Act of 1950**

89. §843. Application of Internal Security Act of 1950 to members of Communist Party and other subversive organizations; "Communist Party" defined (a) Whoever knowingly and willfully becomes or remains a member of (1) the Communist Party, or (2) any other organization having for one of its purposes or objectives the establishment, control, conduct, seizure, or overthrow of the Government of the United States, or the government of any State or political subdivision thereof, by the use of force or violence, with knowledge of the purpose or objective of such organization shall be subject to all the provisions and penalties of the Internal Security Act of 1950, as amended [50 U.S.C. 781 et seq.], as a member of a "Communist-action" organization. (b) For the purposes of this section, the term "Communist Party" means the organization now known as the Communist Party of the United States of America, the Communist Party of any State or subdivision thereof, and any unit or

subdivision of any such organization, whether or not any change is hereafter made in the name thereof.

90. Klaus Schwab's Great Reset is a veiled attempt to infiltrate the workings of the United States Government into Communism. Once President Biden fully embraces the Great Reset's Fourth Revolution, the United States will be a satellite state of WEC's Communist Agenda.
91. It's terrifying that President Biden would be so willingly engage with Schwab's "Great Reset" which is a return of the deadliest social experiments of the 20<sup>th</sup> century. The deadliest social experiment being Communism. Schwab states "There is an urgent need for global stakeholders to cooperate in simultaneously managing the direct consequences of the COVID-19 crisis. "Drawing from the vision and vast expertise of the leaders engaged across the WEC's communities, the Great Reset initiative has a set of dimensions to build a new social contract that honors dignity of every human being." "The growing discontent at the ideology that has created so much wealth and progress on the one hand, and yet so much inequality and instability on the other hand, is causing increasingly frequent social disruptions across the world. "The COVID-19 crisis has laid bare most of these dysfunctions, ranging from uneven access to healthcare, education, economic opportunities, and social progress, to growing inequality among and within nations and racial and ethnic groups. At the center of these multiple crises lies the tension between privilege and meritocracy."<sup>29</sup>

### **COMMUNIST CONTROL ACT OF 1954**

92. In determining membership or participation in the Communist Party or any other organization defined in this Act, or knowledge of the purpose or objective of such party or organization, the jury, under instructions from the court, shall consider evidence, if presented, as to whether the accused person: Has been accepted to his knowledge as an officer or member of the organization or as one to be called upon for services by other officers or members of the organization pursuant to the Communist Control Act, 50.23 U.S.C. § 841.
93. Has written, spoken or in any other way communicated by signal, semaphore, sign, or in any other form of communication orders, directives, or plans of the organization; Communist Control Act, 50.23 U.S.C. § 844.

94. Has indicated by word, action, conduct, writing or in any other way a willingness to carry out in any manner and to any degree the plans, designs, objectives, or purposes of the organization; Communist Control Act, 50.23 U.S.C. § 844.
95. At a panel discussion about The Great Reset hosted by the WEC, Kerry declared that the Biden Administration not only supported a great global reset, but that it “will happen with greater speed with greater intensity.
96. The host of the panel, Borge Brende, asked Kerry whether the WEC and other Great Reset supporters were “expecting too much too soon from the new president, or is he going to deliver first day of this topics?” Kerry responded, “The answer to your question is, no, you’re not expecting too much.”<sup>2</sup>
97. “And yes it [the Great Reset] will happen,” Kerry continued. “And I think it will happen with greater speed and with greater intensity than a lot of people might imagine. In effect, the citizens of the United States have just done a Great Reset. We’ve done a Great Reset. And it was a record level of voting.”<sup>2</sup>
98. Kerry’s statements regarding President Biden’s complicity with the Great Reset is clearly a violation of the Communist Control Act of 1954 7,8,9.

### **PRAYER FOR RELIEF**

WHEREFORE, plaintiff prays for judgement against Defendants and that the Court:

- A. Declaratory judgement that Climate Czar John Kerry on three separate occasions violated the Communist Control Act of 1954, 50.23 U.S.C. § 844 by indicated by word, a willingness to carry out in any manner and to any degree the plans, designs, objectives, or purposes of the organization, World Economic Forum’s Great Reset
  1. At a panel discussion about The Great Reset hosted by the WEC, Kerry declared that the Biden Administration not only supported a great global reset, but that it “will happen with greater speed with greater intensity.
  2. The host of the panel, Borge Brende, asked Kerry whether the WEC and other Great Reset supporters were “expecting too much too soon from the new

president, or is he going to deliver first day of this topics?” Kerry responded, “The answer to your question is, no, you’re not expecting too much.” <sup>2</sup>

3. “And yes it [the Great Reset] will happen,” Kerry continued. “And I think it will happen with greater speed and with greater intensity than a lot of people might imagine. In effect, the citizens of the United States have just done a Great Reset. We’ve done a Great Reset. And it was a record level of voting.
- B. Declaratory judgement that Dr. Anthony Fauci and Dr. Ralph Baric violated 18 U.S.C. 2331 U.S. Patriot Act Section 802, Acts of Domestic Terrorism Resulting in the Death of American Citizens by engaging directly or indirectly by authorizing gain-of-function studies to create a virus with new properties that make it more pathogenic and lethal to the human respiratory system.
- C. Declaratory judgement that Dr. Anthony Fauci and Dr. Ralph Baric violated 8 U.S.C. 2339 C, Funding and Conspiring to Commit Acts of Terror by authorizing and using U.S. government grant funding for gain-of-function study of coronavirus which was an act of domestic terror against the citizens of the United States. The United States taxpayer paid for the creation of a virus to cause the death of them or their loved ones through the defendants acts of terrorism funding.
- D. Declaratory judgement that President Joseph Biden, Climate Czar John Forbes Kerry, Dr. Anthony Fauci, Dr. Ralph Baric, CDC, Bill & Melinda Gates Foundation conspired to commit commercial criminal activity in violation of 15 U.S.C. §1. The named defendants conspired to modify a pathogenic that is now known to the public as COVID-19 for the purposes of financial gain through patent licenses, royalties, vaccine sales for pharmaceutical partners Pfizer & Moderna, and the catalyst needed for the United States to enter Klaus Schwab’s World Economic Forum Communist Great Reset.
- E. Award Plaintiff his attorney costs, expenses, and reasonable attorney fees pursuant to 42 U.S.C. § 1988

**Luke Fontana**

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