UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

Cause No.: 8:12-cv-02519-EAK-AEP

Torm Howse *ex relatione* the United States and each and all fifty (50) of the several sister States and Commonwealths, Plaintiffs, v. Planned Parenthood Federation of America, National Abortion Federation, Center for Reproductive Rights, National Network of Abortion Funds, NARAL Pro-Choice America, Choice USA, National Organization for Women, EMILY's List, Feminist Majority Foundation, Family Planning Councils of America, and all other persons, entities, and instruments so similarly situated, Defendants, *and*, Torm Howse, individually, as a taxpayer, and *ex relatione* each and all fifty (50) of the several sister States and Commonwealths, Cross-Plaintiffs, v. The United States a.k.a. the United States Federal Government, Cross-Defendant.	Class Action Complaint Injunctive Relief Sought Constitutional Challenge Demand for Jury Trial

First Amended Complaint

Comes now the Relator-Plaintiff, Torm Howse, on matters of overwhelming national security intertwined with global public interest, showing this Honorable Court as follows:

INTRODUCTION

1. Relator-Plaintiff brings suit now at bar, on the behalf of all fifty (50) sister State and Commonwealth Co-Plaintiffs, as well as also on behalf of Co-Plaintiff United States, together, against actions, products and services by and through ten (10) formally-named "national" non-governmental Defendants, and against the same by and through all peers and affiliates of these ten (10) non-governmental Defendants (putative Class Defendants), for causing and/or exacerbating dramatically increased and continually sustained losses of national birth rate, hence fundamentally undermining, and eventually destroying in the Summer and/or Fall of 2008, the entire general economy of the United States, of all fifty (50) States and Commonwealths, and of virtually all businesses and citizens in America.

2. While positioned as a fellow and equal Co-Plaintiff in the above issues, the United States Federal Government, a.k.a. the United States, is also the sole Cross-Defendant for the remainder of all causes of action raised herein, said remainder of Counts existing as both directly individual causes by Relator-Plaintiff against the United States, upon their each own individual merits, and simultaneously also as multiple claims under breach of contract by the fifty (50) States and Commonwealths against the Federal Government for its corresponding failures to perform contractual duties either expressed and/or implied within our nation's Founding Documents, which so comprise that all-important contract.

NAMED PARTIES

3. Relator-Plaintiff, Torm Howse, claims dual citizenship with Florida and Indiana, is a father of college-aged children, pays various federal, state, and local taxes, and is/was a registered voter in his residential Pasco County for the 2012 primary and general election.

4. Plaintiffs and Cross-Plaintiffs, the fifty (50) sister States and Commonwealths, are each sovereign and independent governmental bodies, as well as separate, geographically defined areas of land within the collective United States, each being also organized under their own respective Constitutions on behalf, and for promoting and defending the best interests, including the economic interests herein, of each their own respective citizenries.

5. Plaintiff and Cross-Defendant, the United States, a.k.a. the Federal Government, is the national government of the United States of America, officially formed by, and at the moment of, the ratification of the United States Constitution, which also enumerates, and variously authorizes and limits, certain powers and duties on behalf of all 50 States and of all the People therein. It is headquartered in Washington, DC, but also interacts and performs a wide variety of functions in and with every other government and citizen, and does so at, and within, virtually every conceivable geographical location in America.

6. Defendant, Planned Parenthood Federation of America, is a corporation organized under the laws of the State of New York, apparently formed officially in 1922, with its presently-claimed corporate headquarters in both New York, NY and Washington, DC, and self-professing itself to be "the nation's leading sexual and reproductive health care provider and advocate."[1] It is common knowledge Planned Parenthood is this nation's largest provider of abortion services, whether directly and/or through referrals, receiving millions of taxpayer dollars. Planned Parenthood claims to include "79 unique, locally governed affiliates nationwide [who] operate nearly 800 health centers"[2], but this appears grossly disingenuous, considering the fact that within each of the fifty (50) sister States

[1] 02-13-2012, http://www.plannedparenthood.org/about-us
[2] 02-13-2012, http://www.plannedparenthood.org/about-us/who-we-are-4648.htm

and Commonwealths, there are numerous incorporations utilizing the Planned Parenthood name, often named pairs of incorporations (one for normal buildings and services, etc., and the other as a 501c4 political action committee, or PAC) for not only the given State level, but also for most or all of the individual Counties and/or Cities, and/or multi-City or multi-County, and/or regional and other incorporations. Indeed, a very rough estimate, per random "business entity" searches upon a selection of Secretary of State websites, indicates that the full measure of "Planned Parenthood" entities nationwide is probably around a couple thousand or so. All such entities, including Planned Parenthood's 501c4 PAC at national level, "Planned Parenthood Action Fund, Inc.", are all considered to be among the putative Class Defendants, and are hereinafter collectively referred to as a single group under the general Defendant name, "Planned Parenthood", or simply "PP".

7. Defendant, National Abortion Federation, is a corporation organized under the laws of the State of Missouri, apparently formed officially in 1977, with its presently-claimed headquarters in Washington, DC, and self-professing itself to be "the professional association of abortion providers in North America."[3] Putative Class Defendants include the acknowledged, fellow co-conspirators of National Abortion Federation, which are "physicians, advanced practice clinicians, nurses, counselors, administrators, and other medical professionals at 400 facilities in the United States, Canada, and Mexico. We also have international members in Europe, South America, and Australia. Our members are recognized experts in abortion care and include nonprofit and private clinics, women's health centers, *Planned Parenthood* facilities, hospitals, and private physicians, as well as

[3] 02-14-2012, http://prochoice.org/about_naf/index.html

nationally and internationally recognized researchers, clinicians, and educators at major universities and teaching hospitals. Together, they care for more than half the women who choose abortion each year in North America."[4] All such persons and entities are hereinafter collectively referred to as a single group under the general Defendant name, "National Abortion Federation", or as simply "NAF".

8. Defendant, Center for Reproductive Rights, is a corporation organized under the laws of the State of Delaware, apparently formed officially in 1993, with its presently-claimed corporate headquarters in New York, NY, and self-professing itself to be "the only global legal advocacy organization dedicated to reproductive rights"[5] and priding itself for its work in "collaborating with more than 100 organizations in over 50 countries to strengthen reproductive health laws and policies."[6] Of the ten (10) formally-named non-governmental Defendants, this is the only one that does not appear to have affiliates, chapters, subdivisions, otherwise distinct members, or likewise, at state and local levels.

9. Defendant, National Network of Abortion Funds, is a corporation organized under the laws of the District of Columbia, apparently formed officially in 1994, with its presently-claimed corporate headquarters in Boston, MA, and self-professing itself as "a dynamic network of 100 grassroots abortion funds and thousands of activists who serve the women living in their communities, states, regions, and country. All of our actions are guided by the work of our abortion funds and the needs of the women they assist. The majority of our staff are either current or former abortion fund activists. Ten of our

[4] 02-14-2012, http://prochoice.org/about_naf/members.html
[5] 02-14-2012, http://reproductiverights.org/en/about-us
[6] 02-14-2012, http://reproductiverights.org/en/about-us/accomplishments

eleven board members are abortion fund activists."[7] Each such abortion fund and board member are putative Class Defendants, hereafter collectively referred to as a group under the general Defendant name, "National Network of Abortion Funds", or simply "NNAF".

10. Defendant, NARAL Pro-Choice America, is a corporation organized under the laws of the District of Columbia, apparently formed officially in 1975 (under a new legal name since 2003), with its presently-claimed corporate headquarters in Washington, DC, and self-professing itself simply as being "made up of pro-choice women and men across the United States. Together, we protect a woman's right to choose."[8] Defendant further then explains its position in this revealing manner: "Being pro-choice means protecting women's access to safe, legal abortion."[9] Like the expansion scheme of incorporations by Planned Parenthood, this Defendant also entails typically at least two (2) versions of itself within each State and Commonwealth, the 501c3 and 501c4 versions, incorporating as both "NARAL Pro-Choice [state name]" and "NARAL Pro-Choice [state name] Foundation" for the state PAC fundraising side of things. All such entities, including their own 501c4 PAC at national level, "NARAL Pro-Choice America Foundation, Inc.", are all considered to be amongst the putative Class Defendants, and are hereinafter collectively referred to as a single group under the general Defendant name, "NARAL."

11. Defendant, Choice USA, is a corporation organized under the laws of the District of Columbia, apparently formed officially in 1992, with its presently-claimed corporate headquarters in Washington, DC, and self-professing itself via online "About Us" page

[7] 02-14-2012, http://fundabortionnow.org/about/our-people
[8] 02-15-2012, http://www.prochoiceamerica.org/about-us
[9] 02-15-2012, http://www.prochoiceamerica.org/what-is-choice

thusly: "As a national pro-choice organization, Choice USA gives emerging leaders the tools they need to organize, network, and exchange ideas to build a youth centered pro-choice agenda and mobilize communities for reproductive justice."[10] Defendant has its own affiliates, chapters, subdivisions or similar at state and/or local levels, all considered as putative Class Defendants herein, and all together are hereinafter collectively referred to as a single group under the general Defendant name, "Choice USA."

12. Defendant, National Organization for Women, is a corporation organized under the laws of the District of Columbia, apparently formed officially in 1972, with its presently-claimed corporate headquarters in Washington, DC, and self-professing itself as "the largest organization of feminist activists in the United States. NOW has 500,000 contributing members and 550 chapters in all 50 states and the District of Columbia. Since its founding in 1966, NOW's goal has been to take action to bring about equality for all women. NOW works to eliminate discrimination and harassment in the workplace, schools, the justice system, and all other sectors of society; secure abortion, birth control and reproductive rights for all women; end all forms of violence against women; eradicate racism, sexism and homophobia; and promote equality and justice in our society."[11] Said 550 chapters of Defendant are typically named in the fashion "[state name] NOW" and "[county/city/locale name] NOW", and can be browsed by state or zip code directly upon Defendant's national website.[12] All such entities, including their own 501c4 PAC at national level, "National Organization for Women Foundation, Inc.", are

[10] 02-15-2012, http://www.choiceusa.org/index.php?option=com_content&task=view&id=77&Itemid=2
[11] 02-15-2012, http://www.now.org/organization/info.html
[12] 02-15-2012, http://www.now.org/chapters/index.html

all considered to be among the putative Class Defendants, and are hereinafter collectively referred to together as a single group under the general Defendant name, "NOW".

13. Defendant, EMILY's List, is a corporation organized under the laws of the District of Columbia, apparently formed officially in 1984, with its presently-claimed corporate headquarters in Washington, DC, and self-professing itself as "a community of progressive Americans dedicated to electing pro-choice Democratic women to every level of office."[13] Indeed, the singular theme, "*electing pro-choice Democratic women*," is repeatedly plastered all over Defendant's website. Defendant has its own affiliates, chapters, subdivisions, leaders, members, or similar at state and/or local levels, all considered as putative Class Defendants, and together are hereinafter collectively referred to as a single group under the general Defendant name, "EMILY's List".

14. Defendant, Feminist Majority Foundation, is a corporation organized under the laws of the Commonwealth of Virginia, apparently formed officially in 1987, with its presently-claimed corporate headquarters in Arlington, VA, and self-professing itself as "a cutting edge organization dedicated to women's equality, reproductive health, and non-violence."[14] Defendant is sued primarily for its full-blown "*Choices* Campus Program"[15], in which Defendant "employs a full-time staff of Campus Organizers to help students build and sustain pro-choice feminist activist groups called Feminist Majority Leadership Alliances (FMLAs). Campus Organizers also work with existing college feminist groups who wish to receive the support of a national organization through affiliation. The

[13] 02-15-2012, http://emilyslist.org/who
[14] 02-16-2012, http://www.feminist.org/welcome/index.html
[15] 02-16-2012, http://feministcampus.org/fmla/about/default.asp

Leadership Alliances and Affiliates constitute a nationwide network of pro-choice feminist student-run activist organizations. FMF is currently working with several hundred college campuses nationwide and the network is growing every day!" *Id*. All such entities, i.e., "Leadership Alliances" and "Affiliates", also including Defendant's parent organization at national level, Feminist Majority, as well as Defendant's wholly-owned publishing subsidiary, Liberty Media for Women, LLC, and the magazine they create and distribute together[16], *Ms. Magazine*, are all considered to be amongst the putative Class Defendants, and together are hereinafter collectively referred to as a single group under the general Defendant name, "Feminist Majority Foundation", or as "FMF."

15. Defendant, Family Planning Councils of America, is a corporation organized under the laws of the Commonwealth of Pennsylvania, apparently formed officially in 1991, with its presently-claimed corporate headquarters in Washington, PA[17], and self-professing itself as "a national trade association of private, not-for-profit family planning Title X grantees devoted to keeping publically-funded reproductive health services a national priority. Established in 1991, FPCA serves as a forum for the exchange of programmatic, political and professional information; the discussion of common problems; and the provision of technical assistance among nonprofit *Title X grantee leaders. FPCA members head organizations serving as umbrella agencies for the distribution and administration of Title X funds, as well as agencies that provide health care directly. Members are local, state and national leaders in the field."[18] Defendant

[16] 02-16-2012, http://www.msmagazine.com/contact.asp
[17] Defendant does not reveal headquarters, officers, address, phone *or* fax info to the public on its website.
[18] 02-16-2012, http://www.fpcainc.org/about.html

further explains its own definition of Title X Family Planning Program services upon the same page (*id*.), and adds its only online, public reference to corporate structure, which is that its Board is comprised of twenty-two (22) CEOs of member organizations *(id*), each of which is considered a putative Class Defendant herein, and together are hereinafter collectively referred to as a single group under the general Defendant name, "FPCA."

CLASS DEFENDANTS

16. Relator-Plaintiff notes, at the outset, that F.R.Cv.P. Rule 23 does not require any formal motion filed for certification of class. It merely frames the general conditions that are reasonably necessary and applicable in order to lawfully comprise a class of parties, with primary factors based upon the simple realization in a sufficiently-weighty number of parties to raise significant concerns for: (a) avoiding lack of uniformity otherwise; (b) conservation of judicial resources; and, (c) overall efficiency to the law and issues at bar.

17. Putative Class Defendants in this case include peers, affiliates, chapters, divisions, associations, leagues, federations, and all other business relationship partners of the ten (10) formally-named non-governmental Defendants in directly or indirectly promoting, supplying, performing or providing abortion or state-sponsored contraception services, devices, and/or products. A national estimate is roughly 8k to 14k such entities in total.

18. Putative Class Defendants also include other persons, entities, and instruments who have not directly engaged within the actual performance or production of abortion or state-sponsored contraception services, but have otherwise materially assisted efforts to increase and/or sustain the losses of our national birth rate through abortion-on-demand, state-sponsored contraception services, state-sponsored sterilizations, and etc., to-wit:

a) Any and all persons, entities, and instruments that have provided direct financial assistance to these programs of unnatural reductions in our national birth rate, i.e., any and all incorporated Foundations, Funds, PACs, persons, entities, or other instruments which have donated or otherwise provided monies to abortion and said similar issues;

b) Any and all news media outlets and personalities that have publicly promoted, or endorsed any of these programs in unnatural reductions of our national birth rate;

c) The entire LGBT community, and more particularly, the public personalities, leaderships, and formal entities of that persuasion who have affirmatively assisted, in addition to their own "lifestyle" direct damages upon our nation's birth rate, any of these programs in unnatural reductions of our national birth rate, by various methods;

d) Persons in offices of the public trust who gained their positions in significant part due to campaign, political, and/or social efforts by the abortionist and LGBT communities, i.e., having a demonstrated political history in support of promoting any and/or all of the damaging issues now at bar herein, i.e., abortion, state-sponsored contraception, state-sponsored sterilization, state-sponsored gender changes, gay marriage, "civil unions", "domestic registries", or such similar economic destruction;

e) All doctors, other licensed medical personnel, administrators, facility owners, manufacturers and dealers, counselors, pharmacies and others who have "specialized" in abortion, state-sponsored contraception, and/or state-sponsored sterilization;

f) Manufacturers and distributors of abortifacients, contraception and sterilization drugs, including both major pharmaceutical companies, and even nations like China;

g) Oxymoronic "religious pro-choice" entities for promoting economic destruction;

h) And, even certain of the Fortune 2000 companies, for corporately and publicly promoting the same economic destruction results of "pro-choice" and similar issues.

JURISDICTION AND VENUE

19. The Court has subject-matter jurisdiction pursuant to 28 U.S.C. § 1331 and § 1361 because this action arises under the Constitution and laws of the United States. This Court has jurisdiction to render declaratory and injunctive relief under 28 U.S.C. § 2201 and §2202. Jurisdiction is further appropriate in this Court under 18 USC § 1964, 31 USC § 3732, and directly via the original Founding Documents, but the latter action does not technically fall within this Court's jurisdiction, being superior matters between the sister States and Commonwealths, themselves, above and outside the power of this Court.

20. This Court also has jurisdiction by virtue of the Federal Torts Claims Act, 28 USC § 1346(b), *et seq*., and 28 USC § 2671, *et seq*.

21. Venue is proper within this Court pursuant to 18 USC § 1965, multiple provisions of 28 USC § 1391, and 31 USC § 3732, amongst other federal statutory authority, and for the purposes of constitutional breach of contract by the United States, this Court is equally as suitable as any other U.S. District Court, and simply provides the most well established type of forum for the parliamentary procedure in discussion needed by all the Plaintiff States and Commonwealths with the Cross-Defendant, the Federal Government.

22. Pursuant to 28 USC § 1402(b), venue is also proper in this Court because Relator-Plaintiff resides in this District and because at least some of the events and/or omissions which give rise to Plaintiffs' complaints occurred in this District.

23. Relator-Plaintiff reserves the right to amend for any further jurisdictional claims.

STATEMENT OF FACTS (PART I)

(Against all ten [10] non-governmental Defendants and putative Class Defendants)

24. The relevant portion(s) of each and every single formal Declaration and Petition filed contemporaneously herewith upon initial filing is/are now incorporated by reference the same as if it/they had been fully set forth herein (H.I.), most especially including and referencing Relator's Declaration of Facts Regarding Abortion and the U.S. Economy.

25. Since just 1973 and *Roe v. Wade*, well over 50 million abortions, and possibly as many as 65+ million abortions, have been performed in this nation, literally on demand.

26. Abortion-on-demand, state-sponsored contraception, and all other unnatural forms of dramatically decreasing our nation's birth rate from what it would have normally been otherwise, are the primary culprits, by far and away above all other factors combined, in the eventual destruction of our nation's economy, finally experienced in 2008 meltdown.

27. America's economy is 70% consumer-driven, and no consumer-driven nation can ever financially survive by killing its own consumers before they even start consuming.

28. Well over 50 million abortions is the same as well over 50 million consumers, or **well over 1/6th of America's entire consumer base**, precluded from ever *existing*, let alone *consuming*, and is the same wrongfully missing 50+ million taxpayers, and is also the same wrongfully missing 50+ million employed and productive workers, hence also eventually collapsing our economy in direct manner, let alone also the *parallel* tsunami lurking and growing within the skewing of population ratios, and therefore also the raw mathematics behind all pension plans, securities derivatives, Social Security, various other government entitlement programs, and all other similar financial instruments.

29. America's rapidly-expanding prosperity over its first two hundred years was due, in significant part by the sheer function of financial mathematics, to a rapidly-expanding population; All insurance actuarial tables, private and public pensions, Social Security, Medicare, Medicaid and all other large entitlement programs, have always been and also necessarily are based upon the function and expectation of population **growth** factors.

30. The continuing artificial impact and reduction of the nation's overall birth rate, over four decades now, from what it would normally have been on its natural own path, is directly responsible for variously slow and steady skews, and also ever-increasing gaps, amongst and between ratios of total populations/demographics for different age groups.

31. Relator invokes the doctrine of *res ipsa loquitur* (Latin for "the thing speaks for itself"), in that, after awareness and realization has been now brought to light, it is readily and plainly obvious that any and all events furthering and/or sustaining unnaturally high losses in birth rates is directly responsible for undermining and destroying our economy.

32. By participating either directly and/or indirectly in furthering and/or sustaining unnaturally high losses in our nation's birth rates, and/or in furthering and/or sustaining unnaturally growing skews and gaps within our nation's population ratios, via material assistance given in performing, funding, promoting and/or otherwise supporting abortion, state-sponsored contraception, state-sponsored sterilization, and similar birth-rate-killing issues, Defendants Planned Parenthood, NAF, Center for Reproductive Rights, NNAF, NARAL, Choice USA, NOW, EMILY'S List, FMF, FPCA, and as well as their putative Class Defendant co-conspirators, have all engaged in affirmative acts which directly and greatly harmed the economies of governmental Plaintiffs, even into trillions of damages.

33. Not a single human being herein, no matter what their relation to this case is, and including all persons in charge, care, control, custody and/or management of all entities and instruments named as formal Defendants, Plaintiffs, and putative Class Defendants, was ever aborted as a fetus; Neither was any such same person ever trained during their childhood that killing a human baby still inside the mother's womb, either before or at the moment of impending birth, was – in any, way, shape or form – a proper and reasonable thing to do; Neither was any such person, who claims to have *ever* had even the slightest affiliation with any divisions of Christianity, Judaism, Islam, or of *any* other widespread and normalized faith practiced around the world, *ever* instructed by their respective book of worship into believing, *whatsoever*, that either abortion or sterilization is acceptable.

34. Not one single program of K-12 public education material, ever, within the United States' public school systems, has ever instructed that abortion or sterilization of humans as being any right, proper, reasonable, and desirable action by one human upon any other, and no same school has ever taught that increased contraception is good for the economy.

35. Not counting state or local government matching and/or other funds, the federal government has spent *at least* between $500 million and $600 million in combination of Title X Family Planning programs and corresponding portions of Medicaid and all other programs, annually, during each of the past six (6) fiscal years, and if not a much higher amount in total, on abortion-on-demand, state-sponsored contraception, state-sponsored sterilization, and other such things negatively impacting the nation's overall birth rate; Indeed, the total, overall amount of all such annual federal spending may be slightly over $1 billion, actually, and certainly is *at least* that much if including state and local funds.

COUNT I: RACKETEERING (RICO)

(Against named Defendants Planned Parenthood, NAF, NNAF, NARAL, Choice USA, NOW, and FPCA, and also against all putative peer Class Defendants)

36. Most formally-named Defendants, and an unknown but certainly sizable number of all putative Class Defendants, have been and/or are currently "operating" via various corporations as self-claimed, yet either their primary operations headquarters and/or any affiliated sub-divisions are in present and continuing violations of state laws requiring that basic company and company officer information is not only filed, but also current. *See*, especially, the original Verified Complaint, *et seq*., ¶¶ 35-39, at pages 18-19 therein, now incorporated by reference the same as if they had been fully set forth herein (H.I.).

37. As legally invalid companies under the various state corporation laws, all of these numerous entities involved with submitting paperwork in regards to obtaining tax dollar funding of abortion services, contraception and/or sterilization, without compliance in said laws, are all illegally processing those forms and claims back and forth between our federal, state and/or local governments, via both hardcopy paper and computer methods, meaning that all such non-compliant and invalid "companies" are also in direct, multiple if not *exceedingly* numerous (i.e., patterns and practices of) criminal and civil violations of various federal statutes, including *at least* mail fraud (18 U.S.C. § 1341), wire fraud (18 U.S.C. § 1343), and health care fraud (18 U.S.C. § 1347), not to hardly mention the several other "trigger statutes" listed under 18 USC § 1961(1)(B), i.e., Racketeering acts.

38. Because every such unlawful act in said governmental claims processing is, in fact, a separately-chargeable crime for mail fraud, and for wire fraud, and for health care

fraud, and typically for at least a few of these several other trigger statutes, that more than satisfies the minimum requirement of any two (2) such triggering acts to constitute a full "pattern of racketeering activity" under 18 USC § 1961(5), hence all such entities that are in non-compliance with state corporation laws, yet still processing governmental forms via paper and computer towards any form in obtaining such governmental monies, as is all above described, are absolutely guilty and liable under federal racketeering laws (Title 18, Chapter 96, of the United States Code), regardless if the Attorney General prosecutes.

39. Moreover, the unlawful processing and submittals of said claims forms for monies from federal and state coffers has therefore directly harmed the governmental Plaintiffs by obtaining monies said Defendants and putative Class Defendants were not entitled to.

COUNT II: FALSE CLAIMS

(Against named Defendants Planned Parenthood, NAF, NNAF, NARAL, Choice USA, NOW, and FPCA, and also against all putative peer Class Defendants)

40. All paragraphs 24-39, *supra*, are now incorporated by reference the same as if they had been fully set forth herein (H.I.).

41. As often demonstrated throughout herein, to actually fund, using *either* public *or* private monies, our own nation's mathematically-guaranteed economic doom, via either causing, furthering and/or sustaining unnaturally high and artificial reductions in birth rates and various, intertwined ratios and totals of population growth, caused by the primary effect of the Federal Government's mistake in legitimizing, and also providing a wide array in allotment of tax-supported programs for, abortion, contraception, and also sterilization services, is a total pattern of acts that must be necessarily deemed as *false*.

42. Again, not a single human being involved herein was ever trained as a child, or by their public schools' various educational programs, or by their chosen worship books, to believe that any of these such acts artificially reducing birth rates is any kind of natural act to perform upon any other human being, i.e., all of these such deplorable and wanton acts are *unnatural* acts for mankind to commit; they are *false* acts within human society.

43. In other words, at and during all such material times relevant herein, the various claimants to federal tax dollars for these particular programs and services **always knew** that such acts upon other human beings are instinctively *unnatural* and *false* actions, or, rephrased, the claimants have made their various and numerous claims unto the Federal Government for monies by *necessarily* acting in either deliberate ignorance of the truth or falsity of the information about these matters, and/or acting in reckless disregard of the truth or falsity of the information about these matters, all in direct violation of federal false claim statutory proscriptions as contained and enumerated under 31 USC § 3729.

44. Under whatever section of the False Claims Act employed, the government or a *qui tam* plaintiff must prove the following: (1) that the defendant presented, or caused to be presented, to the United States government any claim for payment or approval, or any document to facilitate the payment of a false claim; (2) that the claim and/or document was false or fraudulent; and (3) that the defendant knew that the claim was false or fraudulent, or acted with reckless disregard of the truth or falsity of the claim. If these elements are present, a violation of the FCA occurs even if the government *never* actually makes any payment or suffers any financial loss. The defendant does <u>not</u> have to act with a specific intent to defraud in order to be liable, as long as the *submission* was knowing.

45. Accordingly, *every* single "claim" or other obtaining of reimbursement, payment or other form and type of money, that has ever been submitted to the Federal Government in regards to being paid with federal tax dollars, whether directly done or on behalf of another, for any and all abortion, contraception, and/or sterilization services is, again, automatically *false*, i.e., "false claims" directly in the letter and spirit of *qui tam* actions raised pursuant to and under 31 USC § 3730 (civil actions for false claims), and the undersigned Relator has every straightforward legal right to now so sue herein, on behalf of the United States Federal Government, for **all** such false claims submitted during the prior six (6) years to the Federal Government, pursuant to 31 USC § 3731(b)(1).

46. Therefore, said Defendants and all putative Class Defendants (again, the number of which is roughly estimated at between 8k and 14k such entities nationwide) who have ever presented, or caused to be presented, to the United States government any claim for payment or approval, or any document to facilitate such payment, regarding any of these big unnatural birth rate loss issues (*abortion-on-demand, state-sponsored contraception, state-sponsored sterilization*), at any one (1) or more times during the past six (6) years, are all absolutely guilty and liable for violations of the federal False Claims Act.

47. Approximately 97.5% of all "family planning" services are federally funded, while the States provide the other average 2.5% in funding. Federal funding is primarily from Medicaid, Title X, Social Security Block Grants (SSBG), and the Temporary Assistance for Needy Families (TANF) program, along with relatively tiny portions coming from other federal sources. Additionally, some States receive significant federal funding for family planning through the Maternal and Child Health (MCH) block grant.

48. During and for FY2006, some $1.85 billion in federal taxpayer money was spent on domestic "family planning" programs in the United States, including $1.3 billion from Medicaid funds (70.6% of domestic total), $241 million from Title X Family Planning funds (13.1% of domestic total), $215 million from SSBG and TANF funds (11.7% of domestic total), and $38 million from MCH funds (2.1% of domestic total)[19].

49. During and for FY2010, some $2.37 billion in federal taxpayer money was spent on domestic "family planning" programs in the United States, including $1.8 billion from Medicaid funds (75% of domestic total), $228 million from Title X Family Planning funds (10% of domestic total), $50 million from SSBG and TANF funds (2% of domestic total), and $29 million from MCH funds (1% of domestic total), plus the rapid expansion after FY2006 to also include family planning services within CHIP, amounting to $294 million of mischaracterized "state-only" funds that are actually federally provided[20].

50. Similar figures may not yet be available for FY2012, but the total amount spent on domestic "family planning" programs is surely yet higher again, *at least* $2.5 billion.

51. And, then there are also the additional large amounts in federal taxes spent upon international "family planning" aid, given unto many other countries around the world.

52. Congress appropriated some $648.5 million for FY2010 bilateral and multilateral international reproductive health and family planning assistance, and the FY2012 White House budget proposed yet another whopping increase of $121 million (an increase of 19%) above the FY2010 level[21].

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[19] http://www.stopp.org/article.php?id=9078
[20] http://www.guttmacher.org/pubs/Public-Funding-FP-2010.pdf
[21] http://www.rhrealitycheck.org/blog/2011/02/14/presidents-proposed-2012-budget-title-international-family-planning-funding-increase

53. In any event, the annual totals of all federal expenditures upon both domestic and international family planning programs for the past six (6) years have steadily increased from roughly $2.3 billion in FY2006, to roughly $3 billion in FY2010, and to most likely somewhere roughly between $3.2 billion to $3.3 billion during and for FY2012.

54. Of course, not every dollar of these monies is spent upon causing, furthering or sustaining the wrongful birth rate loss issues herein (abortion-on-demand, state-sponsored contraception, state-sponsored sterilization), but some smaller portions of these monies are spent upon items and services that do *not* run afoul of the merits of this case, such as pelvic and breast exams, tests for HIV and other sexually transmitted diseases, and etc.

55. Pursuant to express statutory mandates under the FCA, Relator is to be paid by the Federal Government, as his "whistleblower" award, an amount that is equal to the proper percentage ratio under federal law, as to the entire aggregate total of all such false claims made during said period of time, of either 30%, 25%, 20%, or, <u>at minimum</u>, 15% of the total amount in question, and, over the past six (6) years **in just abortion services only**, that sub-total amount is calculated to be *well over* $3 billion (at $500-600m/year), already appearing to grant Relator an unquestionable <u>minimum</u> of *at least* $450 million in said whistleblower award, if not even <u>substantially</u> higher.., and *still not yet* counting any of the federal taxpayer monies expended for sponsored contraception and sterilization.

56. Indeed, because we're talking about fraud (and false claims is just one form of fraud), fraud vitiates all contracts, judgments, and everything else under law, resulting in a technical possibility of Relator suing for all Title X Family Planning program monies spent since the Federal Government's original day of such inception, clear back in 1970.

57. Further, and because these programs are run on a continually annual basis, this Relator could also well sue, under normal federal limits, for maybe even the *next* 4 years.

COUNT III: FRAUD

(Against all ten [10] non-governmental Defendants and putative Class Defendants)

58. All paragraphs 24-44, *supra*, are now incorporated by reference the same as if they had been fully set forth herein (H.I.).

59. By continually promoting "choice" for abortion and dramatically increased usage of contraception through state-sponsored channels, and thereby eventually destroying our nation's economy, all ten (10) non-governmental Defendants, and also all putative Class Defendants, have *necessarily* been engaged in making false representations regarding the material fact of "safe" or "safety" for America, the government Plaintiffs, and all citizens.

60. Because not a single non-governmental Defendant or putative Class Defendant, nor any of their principals, was ever taught, instructed, or raised to learn that any of these unnatural actions causing dramatic loss of our national birth rate and corresponding full destruction of our nation's economy was, in any way, either a right, proper, reasonable, or desirable action by one human or entity to commit upon any other human being, and because all said Defendants, putative Class Defendants, and their principals already knew that any decrease in taxpayer base numbers equals a corresponding loss in government revenue, that any decrease in number of skilled workers harms productivity opportunity, and that any decrease in sales and/or consumerism likewise directly harms the economy of any nation that is mostly consumer-driven, all same said Defendants and putative Class Defendants knew or should have known that the representations they continued to make

to the governmental Plaintiffs herein, to America, and to all citizens, are, were, and have necessarily *always* been false representations.

61. All said Defendants, putative Class Defendants, and their principals obviously and clearly intended that their representations would induce the governmental Plaintiffs to act upon them, otherwise they would not have continually acted in relative concert to further expand and promote more "choice" politicians, more "choice" government monies, more favorable laws enacted to increase their private businesses, and so forth and so on, etc.

62. Accordingly, all of the governmental Plaintiffs herein have suffered tremendous and direct financial damages in justifiable reliance on the continual false representations, and so all ten (10) named non-governmental Defendants and putative Class Defendants are necessarily liable unto the fifty-one (51) governmental Co-Plaintiffs for the actual trillions of dollars in damages actually sustained from the economic meltdown of 2008.

PRAYER FOR RELIEF UPON COUNTS I, II, AND III:

63. Regarding Counts I through III, Relator so now prays for the following relief:

a) An injunctive declaration by this Court, permanently enjoining the practice of abortion-on-demand within all U.S. jurisdictions and lands, forbidding the usage of either public or private monies towards abortion-on-demand, and reserving only the rare, few recognized "exceptions" (serious health risk to mother, rape, incest, etc.) to that new standard, as for either exclusivity or inclusivity by the sister States and Commonwealths in their own sovereign applications of and regarding that standard;

b) An injunctive declaration by this Court that the government's "compelling interest" in all of these matters, i.e., as a <u>direct and tremendous</u> concern of national

economic security, must *necessarily* be against contraception, sterilization, and loss of birth rate in general, therefore also permanently enjoining all *government-sponsored* programs to fund, practice or promote any of the same, but said injunctive declaration by this Court reminding and clarifying that *private* persons maintain their full and private rights to *privately* purchase and *privately* employ contraception or sterilization;

c) For the whistleblower portion on false claims for the past six (6) years, an award pursuant to law paid by the Federal Government unto the Relator, i.e., in the minimal amount of at least $450 million, if not even substantially higher by law – provided, however, that Relator offers to waive everything down to a *single* year's worth of false claims, even paid to him at the statutory *minimum* rate of 15% of such current annual total, plus voluntarily dismiss all other claims available via Counts I and III unto the Government's choice in continuing any said matters, for a quick settlement obtained upon and through an *extremely* generous set of terms yet to be drafted and tendered;

d) And, all such further relief the Court deems most proper and reasonable herein.

STATEMENT OF FACTS (PART II)

(Against the Cross-Defendant, the United States a.k.a. the Federal Government)

64. The triplet of our Founding Documents, i.e., the Declaration of Independence, the Articles of Confederation later as then upgraded and refined into the newer Federal Constitution, and together with nationalizing our monetary system in final contractual compromise by also adding the Bill of Rights (the first ten Amendments to the Federal Constitution), comprise the most all-important contract in America – ever – created in mutual legal agreement by the citizen People, by and through their respective States.

65. The People and the States were, and are, the superior "parent" parties to this contract, and the entity created solely *by* this contract is the inferior "child" party, i.e., the Federal Government, assigned with certain limited powers and duties, and provided financing and other resources, "hired" **solely** to *properly* manage our national affairs.

66. All three (3) parties to that same binding contract *may*, legally speaking, at any time, whatsoever, declare a breach of either "performance" and/or "consideration" as to any of the terms involved, and as to any particular party's failure in performance or consideration rendered, hence terminating the contract, for all practical effects.

67. If the Federal Government decided it had compelling grounds to declare one or more breaches by the States and/or the People, then it, *in fact*, may choose to terminate the contact and dissolve itself into nothing. However, the originator parties, the superior, creating "parent" parties to that contract, the States and People, may *not only* declare breach and termination, but as the superior creating parties of the contract, they *also* have the power to dictate new terms, and/or hire and fire at will, *without* fully terminating.

68. Without question, it is painfully obvious that the Federal Government is even *beyond* gross mismanagement, gross negligence, gross dereliction of duties, and so forth, as to so many of even its *basic* functions "hired" for, including total, utter failures: to properly defend our nation, its borders, and its representatives to other countries; to successfully maintain and grow our individual liberty and prosperity; to properly and reasonably manage our nation's wealth and economy in a continually-positive fashion; to provide actual balanced, fair, and honest elections; to combat special interests, instead of coddling yet even more; to always and very vigorously protect and defend our religious

liberties, instead of trampling upon them; to actually police itself and maintain the highest of self-integrity; and more, all as variously enumerated within our Founding Documents.

COUNT IV: BREACH OF CONTRACT

(Against the Cross-Defendant, the United States a.k.a. the Federal Government)

69. All paragraphs 24-66, *supra*, are now incorporated by reference the same as if they had been fully set forth herein (H.I.).

70. Accordingly, by failing many of even its most basic Constitutionally-enumerated duties unto the States and Commonwealth, commanded by and through said original and still-binding contract formed by the Founding Documents, the current management of the Federal Government, and/or the Federal Government, is/are already in breach of contract, and the States and Commonwealths are superior in their original contractual party power as to what all repairs, changes, and/or any other sort of modifications, including any need deemed implicit therein to fire and hire at will from amongst all current employees of the Federal Government, shall be deemed necessary and required to ameliorate said contract, in lieu of any actual and final dissolution and permanent termination of said contract.

71. Because this case is already well complex enough as it is, only two (2) kinds of examples in breach of contract will be displayed as more than sufficient: (1) examples of gross failures to ensure fair and honest elections (*breach of duty*, *duty of care*, etc.); and (2), examples of gross failures to ensure reasonable fiscal management of our national economy (*breach of fiduciary duty*, *mismanagement*, *failure to perform*, *negligence*, etc.).

72. Each of the following examples is also maintained as a separate, individual cause of action in all practical effects, to be argued, addressed and resolved upon its own merit:

a) ELECTION – **Failure to ensure valid candidates for federal office**: Obama, who twice forfeited away his any prior U.S. citizenship level, can *only* possibly be just a mere "naturalized" citizen – at very best – hence he *cannot* even be remotely eligible for the U.S. Presidency as a top-tier "natural born" citizen, and he was also never eligible prior. *See*, Declaration on Obama Ineligibility for the U.S. Presidency, filed initially, and incorporated by reference the same as if fully set forth herein (H.I.);

b) ELECTION – **Failure to follow and obey the 12th Amendment**: Repeatedly a breach of contract again every four years, the Federal Government continues failing to ensure that all presidential candidates and vice-presidential candidates are *separately* balloted, so that the citizen voters may exercise their absolute right to freely choose any pair for the White House, *regardless* of the two candidates' particular political party affiliations. *See*, Parallel Petition to Strike Down the Twelfth Amendment, filed initially, and incorporated by reference the same as if fully set forth herein (H.I.);

c) ELECTION – **Failure to ensure honest and valid elections**: Regardless of any acts or omissions, and whether allowing, condoning and/or conspiring in election/vote fraud of the highest magnitude, the result is still the same violation, with literally thousands of recent media reports of fraud literally all across the nation in regards to the recent Presidential election, by people, rigged machines and rigged software. *See*, Emergency Petition to Enjoin All Pending U.S. Election Processes for the Offices of President and Vice-President, and, Parallel Petition to Disqualify and Enjoin Both Barack Obama and Mitt Romney from Acquiring the Office of U.S. President, filed initially, and incorporated by reference the same as if fully set forth herein (H.I.);

d) ECONOMY – **Gross/reckless fiscal mismanagement**: Regarding some four decades of absolute financial incompetence about the various unnatural birth rate loss issues having literally destroyed our entire national economy finally, i.e., abortion, state-sponsored contraception, and state-sponsored sterilization. *See*, Counts I through III, *supra*, and incorporated by reference the same as if fully set forth herein (H.I.);

e) ECONOMY – **Failure to ensure true and valid legislation**: ObamaCare is already documented by the Federal Government, itself, to end up costing taxpayers over $300 billion/year – every year – once it is fully implemented, and that already defeats its own purpose in supposedly 'saving' money on health care costs. Moreover, it cannot even possibly be true and valid legislation, when it is already constitutionally void as an unlawful attempt to implement both of the primary tenets of Communism, when it is also already constitutionally void for failing parliamentary procedure within the U.S. Senate, when it is also already constitutionally void as a directly unlawful act of Taxation Without Representation, and when it is also already constitutionally void for failing to be properly signed into law. Further, all prior ObamaCare court cases are absolutely void for lack of required and most proper parties, i.e., the federal Senate and federal House, who are mandated to defend their own Acts in courts. *See*, Parallel Petition to Vacate ObamaCare as Procedurally Void, filed initially, and incorporated by reference the same as if fully set forth herein (H.I.);

f) ECONOMY – **Gross/reckless fiscal mismanagement**: Contrary to recent mainstream media reports of "only" about $1.03 trillion currently being spent annually on various forms of welfare assistance, the true number is actually something over

$1.5 trillion, or roughly 10% of our entire nation's annual GDP, and yet America gets virtually nothing in return on investment, while our nation's various critical infrastructure systems are still crumbling apart. Citizens want good paying jobs to build better lives, not just meager handouts to barely continue surviving. Instead of continuing to throw away $1.5 trillion per year in handouts getting nothing back, the very *nature* of welfare, *itself*, must now transform into a new nationwide system of temporary infrastructure jobs subsidies, which will accomplish these goals, all at the same time: (1) America's tremendous investment will now carry a significant and valuable return on that investment, rippling various other positive financial effects throughout our economy; (2) millions upon millions will be able to re-enter the workforce, get good paying jobs again, and finally get off all welfare assistance; (3) federal, state and local governments will be able to get many desired infrastructure projects done; and (4) America will quickly modernize all of its various infrastructure systems, providing huge additional boost for increasing productivity. *See*, Declaration on Proposed "America Works" Program, filed initially, and incorporated by reference the same as if fully set forth herein (H.I.);

g) ECONOMY – **Gross/reckless fiscal mismanagement**: Of that same $1.5+ trillion yearly in current welfare spending, at least $300 billion is totally wasted by various forms of fraud, abuse, criminal schemes, and similar losses, if not actually $350 billion or more totally wasted – and, that's *every* year. Because some 90-95% of all that waste is based upon personal identity theft/fraud, it is urgent that full database cleanup is performed upon every welfare database system. That is most effectively

accomplished by providing an incentive for each qualifying taxpayer to voluntarily update the government with his/her current residential and other information, so that all such information can be used to purge, update, and cleanup all government welfare rolls, quickly saving America an immediate $200+ billion in the very first year, and saving even more each year thereafter. Detailed in the lawsuit, each taxpayer would fill out the information form, donate $25 of non-perishable food items and one (1) hour of volunteer labor via any participating church, and so then eventually receive an IRS $500 rebate check. *See*, Declaration on Proposed "Harvest Time" Program, filed initially, and incorporated by reference the same as if fully set forth herein (H.I.); and,

h) ECONOMY – **Gross/reckless fiscal mismanagement**: America must return to a "gold standard" as the backing for our U.S. Dollar, immediately. America was on a gold standard for its first 100+ years, and our Dollar remained very healthy the entire time. The value of a mid-1770s Dollar was still worth 90+% of that in 1913, when America substantially went off the gold standard. Yet, after one hundred years of no gold standard, i.e., under "fiat money" (printed money without real backing) as our currency base for the past century, today's Dollar is only worth 5% of what a 1913 Dollar was worth, or you can say the same thing as: it now takes twenty Dollars ($20) to buy what one 1913 Dollar would buy. In other words, our Dollar only lost < 10% of its value during 140 years of being upon the gold standard, but after 99 years without a gold standard, our Dollar has already lost 95% of its former wealth value. During the "classical gold standard" period, annual U.S. inflation rates averaged only a microscopic one-tenth of one percent (0.1%), while under fiat money the annual

inflation rate normally averages anywhere between 2% to 5%, a whopping difference of 20X to 50X the rate of annual loss to our Dollar's wealth value, more familiar to the general public when these annual losses of Dollar wealth (inflation) are phrased as "cost of living adjustments" or similar. Not only is using fiat money an *obvious economic insanity*, all fiat monies are also mathematically guaranteed to end in hyperinflation, sooner or later, and it's only a question of time. There is simply no comparison between the two currency systems for our Dollar. Moreover, every single citizen of each State has an absolute constitutional right to a gold standard, per Article 1, Section 10 of the U.S. Constitution. The clear and present danger of fiat money is so obviously a great destruction to our nation's wealth and survival that no less than thirteen (13) State Legislatures penned 2011-2012 legislation toward the direct restoral of gold and silver in legal tender. *See*, Declaration on Proposed New Gold Standard, filed initially, and incorporated by reference the same as if fully set forth herein (H.I.);

73. These two (2) kinds of examples in breach of contract displayed and incorporated above are certainly more than sufficient to well establish gross breach of contract by the current Federal Government, in relation to its enumerated duties to the sister States and Commonwealths, under, by and through the contract formed in our Founding Documents.

74. Further breaches of contract are shown by the Federal Government allowing wars unilaterally begun by Executive power without Congressional declarations, funding these same unlawful wars whatsoever, the creations of unapportioned taxes, enactments of laws impairing the obligations of contracts, and etc., increasingly damaging our Declaration's core rights of Life, Liberty and the pursuit of Happiness guaranteed for every individual.

PRAYER FOR RELIEF UPON COUNT IV:

75. For Count IV, Relator *ex rel*. the fifty (50) State and Commonwealth Plaintiffs suggests and recommends to all said co-Plaintiffs that Congress be allowed a maximum of ninety-nine (99) days in which to at least begin to effect all satisfactory and necessary repairs as per whatever the States and Commonwealths ultimately decide is reasonable, but, in no event, less than a minimum of including all particular forms of relief below, before the same States and Commonwealths might, together, decide against the Federal Government in various declarations in breach, or even gross breach, of original contract.

76. Accordingly, Relator prays and recommends the following relief, at a minimum:

Priority Structural Repairs

77. Either strike down, or now *actually* enforce, the 12th Amendment's requirement in strict, separate balloting between presidential and vice-presidential candidates, and directly-related, disqualify both Obama and Romney as utterly ineligible, unqualified, and unethical, choosing from four (4) alternatives in correcting our White House, both needs as together and respectively detailed within the initially filed quartet of documents entitled, Declaration on Obama Ineligibility for the U.S. Presidency, and also, Parallel Petition to Strike Down the Twelfth Amendment, and also, Parallel Petition to Disqualify and Enjoin Both Barack Obama and Mitt Romney from Acquiring the Office of U.S. President, and also, Emergency Petition to Enjoin All Pending U.S. Election Processes for the Offices of President and Vice-President.

78. Obviously, an actual declaration that the ostensible, sitting "President" must be removed from office and replaced, for strict lack of constitutional eligibility, is of great

concern to both public and private interests everywhere, including any anxiety about the continuity of our government. However, any *serious* approach to such an important issue would not be *actually* serious, without including the necessarily detailed provisions for covering the related bases in amelioration of the same matters, and these are addressed by the above four (4) documents along with "Count III" in the *original* Verified Complaint.

Economic Relief Packages

79. The United States is to comply with all necessity of acts under Counts I-III above, in regards to termination of all abortion-on-demand, state-sponsored contraception, and state-sponsored sterilization, along with the various other related forms of cleanup relief that will be required thereunder, including engaging both public and private experts in the creation of incentives and support networks towards enhancing our national birth rates.

80. Since fiat currency is inherently doomed, promptly re-install a modernized "gold standard" in two time-step phases, using 7 precious metals, and then adding 5 rare earth metals, all as detailed in the initially filed Declaration on Proposed New Gold Standard.

81. Declare the eventual $300+ billion-per-year "ObamaCare" legislation package as procedurally and totally 100% void for at least four (4) constitutional reasons, any one (1) of which will end it completely, all as is further detailed within the initially filed Parallel Petition to Vacate ObamaCare as Procedurally Void.

82. Transform virtually all current forms of welfare, from "free" handouts of money, services and other benefits, which returns nothing to taxpayers, into free (subsidized) jobs by the millions, in order to rebuild and modernize all our national infrastructure, all as is further detailed in the initially filed Declaration on Proposed "America Works" Program.

83. And, start saving $250+ billion annually, by performing data cleanups within all welfare systems, using $500 IRS rebate checks as incentives for taxpayers, all as further detailed within the initially filed Declaration on Proposed "Harvest Time" Program.

CONCLUSION

84. America's entire national economy was devastatingly hammered in 2008 by the mathematical inevitability of how unnatural birth rate losses cause financial meltdown, and this Court must *literally* save America from this same present and continuing harm.

85. The very same harm is but one of several major structural and economic problems herein raised, individually and jointly via breach of contract, that should all be repaired.

WHEREFORE, Relator *ex rel*. the fifty (50) State and Commonwealth Plaintiffs, in light of very serious national security matters exposed by this Amended Complaint and other relevant matters filed also herein, respectfully declares all in good faith and spirit, demanding various forms of relief as all further described above, providing proper notice and reminder to all of the sister States and Commonwealth of their superior power and rights herein, and moving for all relief deemed as true and proper within the premises.

Respectfully submitted,

/s/ Torm Howse

Torm Howse, Relator-Plaintiff
16150 Aviation Loop Drive
Box 15213
Brooksville, FL 34604
(317) 286-2538 Office
(888) 738-4643 Fax
indianacrc@earthlink.net