

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

Cause No.: _____

Torm Howse <i>ex relatione</i> 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)	Class Action
all other persons, entities, and instruments so similarly situated,)	Complaint
)	
Defendants,)	Injunctive Relief
)	Sought
<i>and,</i>)	
)	Constitutional
Torm Howse, individually, as a taxpayer, and <i>ex relatione</i> each)	Challenge
and all fifty (50) of the several sister States and Commonwealths,)	
)	Demand for
Cross-Plaintiffs,)	Jury Trial
)	
v.)	
)	
The United States a.k.a. the United States Federal Government,)	
)	
Cross-Defendant.)	

Verified Complaint for False Claims, Fraud, Economic Sabotage, Breach of Fiduciary Duties, and Conspiracy to Commit the Same

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 AND SUMMARY

1. The merits of this case shall easily imprison Roe v. Wade¹ into the darkest corner of our nation's legal records, forever surpassing the infamous 1857 ruling in Dred Scott v. Sanford², as the new most notorious and cataclysmic error in U.S. Supreme Court history.

2. While the Dred Scott decision is often remembered as one of the primary catalysts and triggers of the Civil War, the decision in Roe is herein exposed to be **the** fundamental root cause – by far and away above all other factors – of America's economic meltdown.

3. Because America's national economy is seventy percent (70%) consumer-driven, the preclusion of over 50 million additional consumers from ever existing (U.S. abortions since Roe in 1973) is fundamental error in direct, catastrophic contradiction to the basics of economic nature and function, for to continually preclude *an ever-higher-and-higher percentage* of your own consumers *from consuming* is to **willfully** plan self-destruction.

4. In addition to these hard-hitting, direct surface level damages against our economy, the mathematically-guaranteed secondary tsunami collapses of all financial instruments that are necessarily-based upon population *growth*, such as private and public pensions, Social Security and other entitlement programs, securities derivatives, and so forth and so on, eventually manifest themselves as gaps in population ratios reach breaking points.

5. Rephrasing, all American “abortionists” and their means of enterprise, including all persons, entities, groups, associations, political action committees (PACs), and such other financial funds and instruments, who have been openly “pro-choice” and/or affirmatively supported, assisted, supplied and/or otherwise furthered the abortion agenda, whatsoever,

¹ Roe v. Wade, 410 U.S. 113, 93 S. Ct. 705, 35 L. Ed. 2d 147 (1973)

² Dred Scott v. Sandford, 60 U.S. 393, 15 L. Ed. 691, 1856 U.S. 472, 19 HOW 393 (1857)

in any means small or large, are absolutely 100% guilty and liable for *literally* destroying, eventually during the Summer of 2008 and still experienced, the economies of the United States, of each and every sister State and Commonwealth, of each and every County, City and Town therein, and also negatively impacting – if not devastating – the wealth, assets and income of every bank, every business, and every man, woman and child in America.

6. The American housing market, alone, suffered at least a \$14.0 Trillion loss in value because of the bubble crash of 2008, down from a prior \$64.4 Trillion, to \$50.4 Trillion³.

7. Said financial crisis wiped out 25% of personal wealth, or another \$7 Trillion. *Id.*

8. The pensions of American state and local governments are now experiencing over a full trillion dollar gap in funding (over \$3 trillion need versus only \$2 trillion available).

9. There were also significant losses of wealth suffered by the American automotive industry, the same as in all big ticket items, in services, medical, commodities, shipping, travel, and in pretty much everything else, totaling *at least* another several trillion dollars, and all of that *doesn't even begin* to mention unfathomable numbers within derivatives...

10. Therefore, the amount of \$15 Trillion formally named and sought by this action for civil damages is a very reasonable, even conservative, rounded and working figure.

11. However, while treble damages and punitive damages are included as a normal course of suit, those terms become functionally superfluous and mere fantasy in realizing that the entire Class of Defendants – nationwide – only has but token billions with which to compensate the Plaintiff governments, not even **remotely** enough to satisfy *any* award.

³ U.S. Household Deleveraging and Future Consumption Growth, by Reuven Glick, Group Vice President, and Kevin J. Lansing, Senior Economist, Federal Reserve Bank of San Francisco, FRBSF Economic Letter 2009-16, May 15, 2009; Global Household Leverage, House Prices, and Consumption, by Reuven Glick, Group Vice President, and Kevin J. Lansing, Senior Economist, Federal Reserve Bank of San Francisco, FRBSF Economic Letter 2010-01, January 11, 2010.

12. *Precisely* because (a) abortion-on-demand must both necessarily and immediately be halted nationwide, and so there will be no more usage of, or need for, 99% of current abortion-related facilities, (b) the entire Class of Defendants is overwhelmingly liable for the civil damages in compensation, *and* (c) it is obvious every Defendant will easily lose at least everything of asset and value related to promoting abortion, (d) the federal, state and local governments are **inherently** entitled to begin immediate seizures of such assets, and to further issue any and all appropriate executive and/or legislative emergency stays, moratoriums, or other temporary preclusions against all abortion-on-demand, pending the time needed in order to fully detail and enact new proscriptive legislation, regardless of when and how this Honorable Court eventually guides upon the critical issues now at bar.

13. Not limited to *just* abortion-on-demand, and in light of the necessary reversal of destructive population losses, the new paradigm in the “compelling interest” of the state **must** absolutely, for fiduciary duty in economic security, be against all state-sponsored contraception in *any* form, while not infringing upon the private right to contraception.

14. Moreover, and since at least 1970, taxpayer dollars have been fraudulently spent to fund abortions, whether directly or indirectly, and also to fund various state-sponsored contraception forms, either through the Title X Family Planning Program, and/or through Medicaid compensations in some States, and/or through various other federal, state and local governmental disbursements – which all consisted of necessarily “false claims” by decades of grantees and other recipients, and whether intended or not as purposefully-false claims, that is irrelevant to Relator-Plaintiff’s *qui tam* action herein for at least his statutory-minimum **15% award** in terminating all said forms of governmental funding.

15. It is expected that this Honorable Court's primary focus should most favorably be upon deciding the key framework in guidance for all the States and Commonwealths to reconcile their own new legislation packages, in the wake of this Court's historical ruling.

16. The simplest question is easily resolved in one single required set of results – all forms of state-sponsored contraception must cease immediately, and no part of either the federal government, any state government, nor any local government, may ever promote, or tax and spend towards, nor assist any such contraception programs, whatsoever, in any form, ever again. However, government has right to regulate private use safety therein.

17. Because there are three (3) or four (4) basic, widely-recognized “exception” types to the standard abortion-on-demand, i.e., (1) rape, (and/or 2) incest, (3) serious health risk/death to mother, and (4) serious fetal deformity regarding minimum standard of life, this Court should most likely focus upon which way, of the two (2) ways available in the aftermath of striking down *Roe* and all public availability of abortion-on-demand, is the better method for States and Commonwealths to implement their choices of exceptions; i.e., to rule that national economic security concerns means that all abortions **should** be *outlawed*, but to allow the States and Commonwealths to recognize one (1) or more of the standard exceptions as lawful in any such rarer cases; **or**, for this Court to rule that the standard exceptions **should** be *allowed*, but to permit the States and Commonwealths to each enact their own sovereign tempering in using none, any and/or all of the exceptions.

18. The second most hotly-debated issue will likely prove to be the best lawful and/or equitable division of all Defendants' assets in compensations to the various governments, and Relator-Plaintiff strongly urges all *physical* assets be awarded to local governments.

19. The third most litigated issue will likely prove to be the relative liability level of each different sub-type of abortionist for civil damages – were the Defendants “active” or “passive” in their individual or corporate functions, were they “material participants”, just what exactly constitutes engaging in a “significant contributing factor” of abortion, and does any of that really matter in attempted mitigation efforts, when the overwhelming amount of *just* the actual **trillions** of dollars in direct financial damages is so vastly above the entire aggregate of all Defendants’ worth, as to ensure totality judgments, regardless?

20. The fourth and final major topic will likely prove to be discussion and debate for the selection, appointment, granting or similar approval process for entities assuming and converting portions of the governmental-seized abortion and related facilities as **adoption** and related facilities – should there be defined parameters, such as full faith-based history or mere secular “pro-life” history of a given organization, and the same public history in a minimum establishment of, say, three (3) or five (5) years, to *qualify* for such facilities?

21. Relator-Plaintiff believes the above four (4) topics are expected as main litigation issues, while all other likely topics are relatively minor and should remain State-specific.

NAMED PARTIES

22. Relator-Plaintiff, Tom Howse, is a conservative, non-denominational Christian father of multiple children, some of which are already in college and obviously of lawful child-bearing ages, themselves. Relator-Plaintiff claims dual-citizenship of both Indiana, where he was raised and conceived his children, where his immediate family still resides, and where he still has tangible business and enterprise involvements, and Florida, where he has personally resided for the bulk of the prior five-plus (5+) years in the Tampa area.

Relator also co-founded and runs a meager online network of “family rights” activists throughout America, called *United Civil Rights Councils of America*, consisting of some 20,000 alleged victims of improper actions within seven main categories of “family law” proceedings and issues, including (1) divorce and similar actions involving child custody, (2) child protective services, (3) paternity fraud and reverse paternity fraud, (4) juvenile delinquency cases, and (5) elder abuse cases, along with the primary pair of social trouble factors that span these primary family law realms, to-wit: (6) domestic violence, and (7) parental alienation [“using children like pawns” within legal, familial, or other contested dynamics]. To date, neither Relator individually, nor corporately through said network, has ever before formally entered into any litigation on either side of the abortion debate.

23. 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.

24. 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.

25. 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.”⁴ 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”⁵, but this appears grossly disingenuous, considering the fact that within each of the fifty (50) sister States 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 Class Defendants, and are hereinafter collectively referred to as a single group under the general Defendant name, “Planned Parenthood.” *Note that the current official investigations pending against Planned Parenthood are not part of this case, whatsoever.*

⁴ 02-13-2012, <http://www.plannedparenthood.org/about-us>

⁵ 02-13-2012, <http://www.plannedparenthood.org/about-us/who-we-are-4648.htm>

26. 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 corporate headquarters in Washington, DC, and self-professing itself to be “the professional association of abortion providers in North America.”⁶ Class Defendants include the acknowledged 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 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.”⁷ All such persons and entities are hereinafter collectively referred to as a single group under the general Defendant name, “National Abortion Federation.” Defendant is obviously being sued for all of its abortion operations within the United States, but is also sued for participating within international promotion of abortion, as are any and all similarly-situated named Defendants and Class Defendants, for to engage in the purposeful, certain economic destruction of any other sovereign nation not your own, is to willfully engage in international economic warfare, i.e., any such act of international promotion of abortion is *literally* an act of war against the given targeted nation. America must now prohibit all such domestic **and** foreign acts.

⁶ 02-14-2012, http://prochoice.org/about_naf/index.html

⁷ 02-14-2012, http://prochoice.org/about_naf/members.html

27. 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”⁸ and priding itself for its work in “collaborating with more than 100 organizations in over 50 countries to strengthen reproductive health laws and policies.”⁹ Defendant boasts an impressive global litigation record in promotion of more abortion (*id.*), or rather, as an “impressive” record in promotions of economic warfare against quite a significant number of foreign nations in and around the world, not *just* here within and against the United States. Some of these foreign nations may consider their *own* economic suits against this Defendant, in *other* jurisdictions around the world, but this is only *even more reason* why the various governments of the United States (federal, states, counties, cities, towns) should ensure timely prosecution ahead of all other potential claimants. To be sure, this Defendant, like several other types of the Class Defendants, has, in fact, produced apparently good and positive results and benefits within other social, medical and/or legal realms, but even all of that combined *still* doesn’t make up for helping to “successfully” lead the charge, via sponsoring even more contraception and/or even more abortion, to literally devastate and cripple any nation’s economy, by “successfully” lowering that nation’s birth rate to well below what should have, and would have, otherwise materialized. Indeed, and also more particularly to the point herein, Defendant has often “successfully” litigated to open the abortion floodgate ever wider *here*, i.e., has been a **large** factor in harming *our* economy.

⁸ 02-14-2012, <http://reproductiverights.org/en/about-us>

⁹ 02-14-2012, <http://reproductiverights.org/en/about-us/accomplishments>

28. 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 eleven board members are abortion fund activists.”¹⁰ Just as the corporate name implies, Defendant is completely, fully 100% about promoting abortion, unlike other Defendants herein, who at least *purport* involvement with other issues and topics. Indeed, Defendant has been so violently rabid in its relentless efforts to increase the fetal mortality rate and in same efforts to ravage America’s economy, that it openly – brazenly – encourages and even *actually instructs* low-income abortion seekers, directly upon its website, on how to defraud Medicaid into paying for their abortion if they live within one of the fifteen (15) applicable States (AK, CA, CT, HI, MD, MA, MN, MT, NJ, NM, NY, OR, VT, WA, WV), by literally telling people, under the “notes” on the same page, to willfully deceive all our governments in their application process, to-wit: “**When applying**, be sure to *tell your caseworker* that you are pregnant and *would like the application process to be expedited*. **You do not need to tell them** you are planning to have an abortion.”¹¹ However, and like the several unrelated investigations of separate fraud acts by Planned Parenthood, this Defendant’s additional crimes are not intended priority within *this* case.

¹⁰ 02-14-2012, <http://fundabortionnow.org/about/our-people>

¹¹ 02-14-2012, <http://fundabortionnow.org/get-help/medicaid>

29. 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.”¹² Defendant further then explains its extensive efforts behind said “right to choose” in this revealing manner: “Being pro-choice means protecting women’s access to safe, legal abortion.”¹³ Like the similar 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 among the Class Defendants, and are hereinafter collectively referred to as a single group under the general Defendant name, “NARAL.” This Defendant is most proud of its “accomplishments” injecting the fundamental poison of more and more “pro-choice” (abortionist) political candidates into offices of our public trust, i.e., most proud of directly causing an overall faster and faster damages-infliction rate upon our vital economy, causing it to meltdown *even sooner*. In particular, Defendant self-admits liability for causing election of the pro-choice resident of our White House in 2008, and thirty-one (31) of its endorsed pro-choice candidates into our federal Congress in 2010. The total number of state and local harms is unknown.

¹² 02-15-2012, <http://www.prochoiceamerica.org/about-us>

¹³ 02-15-2012, <http://www.prochoiceamerica.org/what-is-choice>

30. 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 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.”¹⁴ For the past decade, Defendant has preyed exclusively upon the naturally-impressionable youth of America in their campaigns promoting abortion, and freely admits it: “In 2001, Choice USA laid the groundwork for making a transition to exclusively become a youth-led and focused reproductive rights organization creating programs that incorporate the lessons learned from our research (and validated by our field experience) to regain young people’s support. Today, our programs reach young people in every region of the country and we have built a strong base of credibility with young activists who praise our leadership development programs, our commitment to mentoring, and our empowering approach to mobilizing and organizing with and around young people.”¹⁵ Defendant’s express goals include the recklessly fraudulent indoctrination of abortion into the hearts and minds of America’s entire next generations. *Id.* This would **permanently** finish off our economy.

31. 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

¹⁴ 02-15-2012, http://www.choiceusa.org/index.php?option=com_content&task=view&id=77&Itemid=2

¹⁵ 02-15-2012, http://www.choiceusa.org/index.php?option=com_content&task=view&id=69&Itemid=7

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.”¹⁶ 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.¹⁷ All such entities, including their own 501c4 PAC at national level, “National Organization for Women Foundation, Inc.”, are all considered to be among the Class Defendants, and are hereinafter collectively referred to as a single group under the general Defendant name, “NOW.” Defendant long ago since revealed its true top-most priority issue, *securing more abortion*, because out of all self-professed important social topics, “**support abortion rights**” is the only one holding special prominence within the “join / give” sub-menu upon Defendant’s website, whereas all other clickable options of said sub-menu are mere organizational topics. Defendant further confirms its long-standing abortion priority by heralding an especially-extensive, individually-clickable, chronological detail of its highlighted efforts, year-by-year.¹⁸ In fact, Defendant’s *fanatical* propensity to increase abortion is manifested once again by all the extreme amount of Defendant’s direct activities in the abortion realm, self-admitted.¹⁹

¹⁶ 02-15-2012, <http://www.now.org/organization/info.html>

¹⁷ 02-15-2012, <http://www.now.org/chapters/index.html>

¹⁸ 02-15-2012, http://www.now.org/issues/abortion/abortion_archive.html

¹⁹ 02-15-2012, <http://www.now.org/issues/abortion>

32. 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.”²⁰ Indeed, the singular theme, “*electing pro-choice Democratic women*,” is repeatedly plastered all over Defendant’s website. Even more intensely than fellow Defendant NARAL, Defendant EMILY’s List is totally 100% focused upon injecting the fundamental poison of more and more “pro-choice” (abortionist) political candidates into the offices of our public trust, i.e., proud of directly causing an overall faster and faster damages-infliction rate upon our vital economy, causing it to meltdown *even sooner*. In fact, Defendant self-admits its own huge level of civil liability herein, by the “success” of its political training program for having poisoned our federal, state and local governments with **many** pro-choice candidates: “The EMILY’s List Training Program has received broad acclaim as one of the best in the nation. Graduates have gone on to play leading roles in critical races across the country for House, Senate, governor – even president.”²¹

33. 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.”²² Defendant is sued primarily for its full-blown “*Choices Campus Program*”²³,

²⁰ 02-15-2012, <http://emilyslist.org/who>

²¹ 02-15-2012, <http://emilyslist.org/what/training>

²² 02-16-2012, <http://www.feminist.org/welcome/index.html>

²³ 02-16-2012, <http://feministcampus.org/fmla/about/default.asp>

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 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 together²⁴, *Ms. Magazine*, are all considered to be among the Class Defendants below, and are hereinafter collectively referred to as a single group under the general Defendant name, “FMF.” Very similar to fellow Defendant Choice USA, *see* more at ¶ 30, *supra*, this Defendant’s express goals include a wild, recklessly fraudulent indoctrination of abortion into the hearts and minds of America’s entire next generations.

34. 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, PA²⁵, 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

²⁴ 02-16-2012, <http://www.msmagazine.com/contact.asp>

²⁵ Defendant does not reveal headquarters, officers, address, phone *or* fax info to the public on its website.

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.”²⁶ Defendant 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.* After further research and investigation, it was learned that the Pennsylvania contingent of the Defendant’s organization held certain extra-special status and relationships, and official incorporation documentation was therefore eventually obtained, leading to exact officers, which currently include Gayla C. Winston, MPH, as Defendant’s President. Gayla also happens to be – according to various news media and other online report sources – the President, CEO *and* Executive Director of Indiana Family Health Council, Inc., one (1) of the Defendant’s twenty-two (22) member organizations, naturally. However, even this kind of corporate leadership and structure information is also found concealed from the general public, as the official staff listing webpage of Indiana Family Health Council²⁷, and apparently *every* other page or resource upon the same website, fails to even so much as remotely mention *either* Gayla Winston or *any* of her three (3) commanding leadership positions. The same significant trend of **concealing** true leadership structure was found as a disturbing practice amongst these various Title X Family Planning funds distributors.

²⁶ 02-16-2012, <http://www.fpcainc.org/about.html>

²⁷ 02-16-2012, <http://www.ifhc.org/about-staff.php>

CORPORATE INVALIDITIES OF DEFENDANTS ARE RAMPANT

35. As a natural byproduct of preparing for Summonses, Relator-Plaintiff conducted very exhaustive and comprehensive research and investigation into the variously-named Defendants, as well as of several other prominent culprits in the abortion industry left as merely special-mentioned examples in the general Class of Defendants. Consequently, it was discovered there exists a terrible, stormy sea in faulty business validity, nationwide.

36. In particular, Secretary of State websites revealed a shockingly wide variety and incidence of “expired”, “forfeited”, “suspended”, “revoked” and such similar terms to describe the current status of incorporation, per each given researched entity, whether one of the main, named “national” Defendant principals, or whether one or more of their state and/or local affiliates. The “national” Defendants have rarely maintained any uniformity or updated status from state to state to state, like actual current officers, principal office addresses, registered agents and/or their addresses, and so forth and so on – and that’s IF they have even bothered to file anything, *whatsoever*, within some of the States that they are obviously still doing business in and with. Indeed, more than one “national” principal Defendant either doesn’t have correct and updated information, or boldly has **nothing** filed, *whatsoever*, in the State or DC that such Defendant claims for its *headquarters* city, while the incredible mess at state and local levels is almost beyond any clear description!

37. In other words, much of the entire “family planning” industry has been, and still is now, operating without any *valid* licensure – no *legally valid* corporation – and yet still is asking for, distributing, transferring and/or receiving, millions upon millions of federal, state and local taxpayer dollars, using thousands of hardcopy paper forms sent back and

forth through the mail, as well as *at least* hundreds of computers and online accounts, to accomplish all of that, i.e., they *are* perpetrating federal mail²⁸, wire²⁹, *and* health care³⁰ frauds, not to mention the numerous state-level criminal and civil statutes being violated.

38. However, and once again, like all the separate, additional, *other* frauds and crimes being committed out there, even daily, by certain of the Defendants and their agents, this case **shall absolutely not** “muddy the water” with any argument, debate or discussion, or other injection, of such extraneous topics. This case must certainly stay narrowly focused upon *only* the primary, systemic issues directly in play, to-wit: (a) any state influencing of contraception; (b) private rights to contraception; (c) abortion-on-demand versus the rare social exceptions; (d) population; (e) birth rates; (f) death rates; (g) adoption; (h) financial mathematics; (i) the U.S. Dollar, and whatever else is **reasonably** applicable to the “law of the case” herein, including fundamental and primary issues regarding remedies sought. NOTICE IS HEREBY GIVEN TO ALL PARTIES, NAMED AND INTERESTED, that Relator-Plaintiff has contemporaneously filed his Notice of Zero Tolerance to this effect, for our National Debt is sinking over \$4 billion deeper into the hole, *each and every day*, or, about \$3 million *each and every single minute*.³¹ No frivolous delay can be tolerated.

39. Instead, the above and important information revealing a nationwide set of issues within the legal business validities of named and Class Defendants is presented only for the Plaintiff Governments’ purposes of enhancing confidence, authority and urgency in effecting immediate seizures and other administrative actions against Defendants’ assets.

²⁸ See 18 U.S.C. § 1341. Example: <http://www.law.cornell.edu/uscode/text/18/1341>

²⁹ See 18 U.S.C. § 1343. Example: <http://www.law.cornell.edu/uscode/text/18/1343>

³⁰ See 18 U.S.C. § 1347. Example: <http://www.law.cornell.edu/uscode/text/18/1347>

³¹ See, e.g., <http://www.usdebtclock.org> and http://www.brillig.com/debt_clock and http://www.babylontoday.com/national_debt_clock.htm

CLASS DEFENDANTS

40. 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.

41. Many types of corporations, associations, groups, and other physical-acts entities, as well as individual persons, intangible financial instruments and accounts and monies, and even lands, buildings, vehicles, and other property, both real and personal, both large and small, are all properly amenable in the Defendant Class for the violations and injuries herein, whether directly and/or indirectly, upon governments, business, and the citizens.

42. Indeed, there are so many different types of persons, entities, and instruments involved and responsible for the civil damages herein, that a *single* Class may neither be fair nor equitable as amongst *different* liability and culpability levels of all Defendants, and yet the entirety of all Defendants, nationwide, could still, in fact, properly fall under but a single Class together, regardless of which of the three (3) types of such class actions is compared, i.e., as a single Class under F.R.Cv.P. Rule 23(b)(1), 23(b)(2), or 23(b)(3).

43. Therefore, a recall of ¶ 19, *supra*, is most appropriate: was a given Defendant “active” or “passive” in either individual or corporate function towards abortion and/or state-sponsored contraception, was there “material participation”, just what does exactly constitute engaging in a “significant contributing factor” leading to damages, and etc.?

44. However, while any comparative fault analysis likely becomes frivolous and moot in the sheer face of actual trillions in civil damages (*even if a Defendant was found to be only liable at one percent [1%], it **still** will mean a totality judgment against **all** assets...*), it is quite another story when it comes to the penalty phase, including issuance of various appropriate injunctions, declarations, and other assorted relief ordered – in other words, while it really doesn't make any difference what a given Defendant's action or inaction has been in causing damages, for establishing *the fact of liability*, the **type** of Defendant implicated often does make a difference in *what can and/or should be ordered in relief*.

45. For example, there is no question that all ten (10) formally-named Defendants are well established in *the fact of liability* for promoting and increasing abortion-on-demand and/or state-sponsored contraception, just as guilty as are all their member associations, partners, affiliates, federations, councils, leagues, and similar at the state and local levels, plus, there are also *several dozen more* Class Defendants who are just like the formally-named Defendants (“national” in scope), including Advocates for Youth, National Latina Institute for Reproductive Health, Guttmacher Institute, National Coalition of Abortion Providers, Abortion Access Project, with plenty more of those..., and then, one may begin estimating all of the many **thousands** of directly-related entities combined at state and local levels – indeed, America holds approximately 3140 counties (Alaska = “boroughs”, Louisiana = “parishes”) and independent cities, with roughly 950 of those representing slightly over 6/7ths of the U.S. population, and in such urban areas, the various Secretary of State websites often show *several* different pro-choice outfits “doing their business” in the same county or city. A national estimate is roughly 8k to 14k such entities in total.

46. The formally listed leadership, officers, owners and other management persons of all the above types of entities are expressly intended and included as formal Defendants herein, equally liable along with their own respective operations, as the “primary tier” or “top offender” group of all Class Defendants. These persons and their entities, whether for profit or non-profit, whether partnership, LLC, S-corp or full corporation, whether 501c3, 501c4 or otherwise, are all of the “primary hands on” or “principal” Defendants, having implemented, caused, induced, assisted, supported, and/or otherwise fomented the very existence of the damages inflicted by all other types of Class Defendants, to-wit:

a) Falsely inducing individual, corporate and foundational donations, benefits and other pecuniary assistance to and through various other Class Defendants regarding the abortion-on-demand or state-sponsored contraception issues herein, with examples including the Dickler Family Foundation, the Educational Foundation of America, the General Service Foundation, the Herb Block Foundation, the Moriah Fund, the Jessie Smith Noyes Foundation, the David and Lucile Packard Foundation, and the Mary Wohlford Foundation³², as well as the NOW Foundation³³, also the Feminist Action Network³⁴, the Center for Reproductive Rights’ over 100 partner organizations from over 50 different countries³⁵, the various and large donations from George Soros and his enterprises financing any such liberalized “reproductive health” efforts, even all public servants, like Mayor Michael Bloomberg, who have publically announced *their own* financial support for any of the Class Defendants, and any and all other persons,

³² 03-20-2012, <http://www.fundabortionnow.org/about/our-supporters>

³³ 03-20-2012, <http://www.nowfoundation.org/about.html>

³⁴ 03-20-2012, <http://www.now.org/membership/fan.html>

³⁵ 03-20-2012, <http://reproductiverights.org/en/resources/partners>

entities or officials who have provided any personal funding or material assistance to abortion-on-demand and/or state-sponsored contraception – all of these *as in addition to* the variously numerous 501c4 PACs of the formally-named Defendants and their aforementioned direct chapters, affiliates, members, and so forth, at state and local levels, referenced as *already* included within the “top offenders” of Class Defendants;

b) Similar to the persons and entities referenced in sub-paragraph a) just above, there are liberal abortionist ringers lurking throughout the news and entertainment industries who are financially liable at *some* level within the overall Class Defendants for propagandizing the same fraudulent and destructive efforts against our economy, with obvious examples including Sandra Fluke, who, already getting a taxpayer free ride into the so-called “one percent” with a Georgetown University law degree, chose to willfully and knowingly defraud Congress with her recent testimony about needing “free” birth control, to the tune of a whopping additional \$3000 college-years burden upon taxpayers (plus more National Debt interest on top of that amount, every year thereafter..) when the fact and reality is that for a mere \$5 to \$10 per month, the same exact thing, her “needed” birth control, is available at any nearby pharmacy, and yet, somehow, Ms. Fluke can afford extravagant *overseas* vacations immediately after said sworn testimony was given. While the begging question of *why hasn't this fraudulent woman been **already** criminally charged and arrested* is immediately imminent, there is no question or doubt that she is rightfully named amongst all civil Class Defendants, along with SKDKnickerbocker, the public relations firm that orchestrated Ms. Fluke's appearance before Congress to testify so falsely, and her supporting barrage of news

appearances thereafter. Of course, heading up the co-conspirator SKDKnickerbocker is Executive Director Anita Dunn, also properly a Class Defendant herein, and who used to be not only the White House Communications Director for Barack Obama, but was very instrumental within the entire modern political career of Barack Obama from 2006 onward³⁶, and in radical liberal politics beforehand (*id.*), and married the man who has been personal legal counsel to Barack Obama since 2007, all of which brings her full circle back again as – indeed – a very prominent Class Defendant herein. Yet another flagrant example is Bill Mayer, the ultra-liberal host of “*Real Time with Bill Mayer*” on the major cable outlet, Home Box Office (HBO), owned by Time-Warner. While, again, there is no question or doubt that Mr. Mayer, himself, is rightfully and properly amongst the various Class Defendants, for consistently defrauding millions of Americans with boisterous (even disgustingly raunchy) promotion of the pro-choice, abortion, state-sponsored contraception and related issues herein, for – like fellow liberal Mayor Bloomberg did for Planned Parenthood – publically announcing a major donation to similar Class Defendant, the Priorities USA Action PAC (which is a 501c4 funding scheme to, *inter alia*, push the radical liberal agenda of pro-choice, abortion, state-sponsored contraception and related issues herein³⁷), for consistently mocking the strong Christian faith of most of our nation’s wise Founding Fathers, and for even *daring* to recently promote (July 29, 2011) that the United States is a *socialist* country already, and so all citizens *should just get used to socialism* as a way of life (arguably punishable under either Title 18, Chapter 115, and/or Title 50, Chapter 23, of the

³⁶ 03-21-2012, http://en.wikipedia.org/wiki/Anita_Dunn

³⁷ 03-21-2012, <http://www.prioritiesusaaction.org/priorities>

United States Code, as subversive and/or communistic statements and/or activities), the same kinds of fiduciary relationships that Ms. Fluke entered into with Ms. Dunn and SKDKnickerbocker are the same kinds of fiduciary relationships that Mr. Mayer entered into with HBO and Time-Warner, and also with Priorities USA Action, over the same kinds of willful fraud and of defrauding America and its citizens, regarding the radical liberal agenda of promoting various pro-choice, abortion, state-sponsored contraception and other such destructive issues herein. But similar examples abound, including major news personalities Keith Olbermann and Rachel Maddow of MSNBC, which publicly admitted its progressive liberal agenda in October 2010, and is owned by NBCUniversal³⁸, Dan Rather³⁹ and CBS (*even Cronkite, if he was still alive...*), various reporters at The Washington Post, at The New York Times, and so forth, all of whom have jointly and individually promoted, in large fashion, the same devastation;

c) Very closely related to the above, and in fact heavily intertwined with the above, is the entire LGBT crowd, and more particularly, the public personalities, leaderships, and formal entities of that sexually perverse, immoral crowd, who are each rightfully and properly included and attached herein as fellow Class Defendants. Indeed, there is an actual overlap and “inter-breeding” between the abortionist crowd and the LGBT crowd, evidenced by the very high incidence of *both types of organizations including board directors from the other type of crowd*, both crowds functionally acting as one in many respects, seeking the same concessions from Congress, supporting most of the exact same political/social issues, acting together in concert online, and so forth. Even

³⁸ 03-21-2012, <http://en.wikipedia.org/wiki/MSNBC>

³⁹ 03-21-2012, <http://www.lifenews.com/2009/09/29/state-4465>

their parallel disdain and often-rabid contempt for common sense Biblical principles, let alone their foolish ridicule for the time-tested truth of the written Word of God, is so strikingly similar as to be virtually identical, as is also the very fundamental nature of both types of crowds in mocking – and generally seeking to destroy – the traditional Judeo-Christian nuclear family unit, while using exceedingly “progressive” methods towards that same mutual goal of worldwide evil, apparently sharing their aspirations with the likes of fellow godless socialists Stalin, Hitler, and so forth. Let us examine the utterly foolish ridiculousness of the LGBT crowd for a simple moment – if we were to, *arguendo*, accept their sexual/social philosophy “alternative lifestyle” as the “proper” behavior of all people (*if they were correct, that is*), and expand upon that “political correctness” (wrong) thinking, then virtually all women would be lesbians, and virtually all men would be gay. Yet, in this only logical conclusion scenario, there would also be virtually no conception of life, whatsoever, and then *not only* would the economy collapse in record time, but *the entire human race* would be extinct within a mere two (2) generations from now, perhaps just three (3) at most... One only has to look at California for the *guaranteed* eventual economic results of fostering a society living in complete rebellion against God’s ways of doing things. After consistently “leading” the nation in its “progressive” thinking, the State of California is not only morally bankrupt, but functionally *beyond* an economic bankruptcy, essentially living on borrowed time, unless very dramatic changes are implemented urgently. Want a private business example of this same reasoning, too, you say? Ok, fine. The New York Times demonstrates it painfully well. The revelation that three-quarters of the

people who decide what goes on the front page of the New York Times are “not so closeted homosexuals” was no big surprise⁴⁰. The *Gay & Lesbian Alliance Against Defamation* (GLAAD) gave the New York Times an award for “outstanding” work. The New York Times also sent a recruiter to a *National Lesbian and Gay Journalists Association* convention in order to specifically recruit homosexuals as journalists⁴¹. More examples abound, but the real proof is in the pudding – after years of especially coddling, recruiting, and greatly increasing the “bias” (the percentage) of their own management and workforce to more and more of the foolish LGBT crowd, the owners eventually were forced to hit the brick wall, financially, because having large numbers of your employees always needing daily doses of expensive HIV treatments⁴² is, well, ***really expensive***, let alone the dramatically increased medical insurance premiums for such a workforce, or for such a workforce’s union(s), and not to even mention wasting extravagant amounts of extra money on “special things” for such a workforce, nor the overall combined effect spreading *also* into critical pension underfunding. And, so, in 2009, the New York Times nearly lost the Boston Globe over these same dramatically inflated costs⁴³, and The Times is, itself, now financially struggling *so bad* that it has had to mortgage its headquarters building, and even offer up the flagship newspaper’s front page for advertising revenue. With many years of similar “biased”, incompetent “leadership”, California is essentially a very large scale version of the management self-destruction by The New York Times. After promoting (and paying for) so much

⁴⁰ 03-22-2012, <http://www.aim.org/media-monitor/more-pro-gay-media-bias>

⁴¹ 03-22-2012, <http://www.onenewsnow.com/Perspectives/Default.aspx?id=232654>

⁴² 03-22-2012, <http://aids.about.com/od/hivmedicationfactsheets/a/drugcost.htm>

⁴³ 03-22-2012, http://en.wikipedia.org/wiki/The_Boston_Globe

abortion and “diversity” costs over the years, the State of California guaranteed itself an eventual economic tsunami, sooner or later. Indeed, the negative economic impact of the LGBT crowd is very “diverse” across the entire spectrum of civilized existence, leading to dramatic increases of pornography, child sexual abuse, human trafficking, the costs of medical care and pension funds as aforementioned, otherwise needless litigation, promulgation of excess rules and regulations, increased taxes, turning 200 years of well-established family law into a new chaos circus which can never reconcile with natural law (which is the mom-parent? which is the father-parent?), and so on, all for a politically correct “privilege” of insanely legalizing the nefarious actions and perverted, unnatural behaviors of these foolish, destructive perpetrators – and plenty more than enough to file suit over... Again, it is very difficult to distinguish much, if any, difference between the abortionist crowd and the LGBT crowd. Both crowds are nearly one and the same, with shared contempt for conception of life within traditional marriage, with shared public positions on social issues, with sharing of supporters, organizations, promotions, activities, and sometimes *even their sources of funding*, not to mention working *very* hard together to mutually promote elections of their fellow radical (“progressive”) liberals into local, state and federal offices, so more of their false, ignorant, immoral and *economically destructive* schemes materialize even faster as detailed elsewhere herein, i.e., for literally creating the very next described type of Class Defendants, which furthered and increased the *rate* of federal taxpayer fraud and *speed* of economic collapse now discussed at bar, plus spawned the inception and the global usage of both of the *next* two (2) Class Defendant types referenced thereafter;

d) The next identified sub-class of Defendants is, were, and are the individual persons in offices of the public trust who gained their positions in significant part to campaign, political, and social efforts by these two same base crowds, the abortionist crowd and the LGBT crowd, i.e., typically the most radical (“progressive”) liberals of past and present elected officials, along with any similar person *currently* running for any federal, state or local office, whether or not the same are now being politically represented as “Democratic”, “Republican”, “Independent” or otherwise, yet having a demonstrated political history in clear 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 other similar economic self-destruction against America. If we were talking about the news and entertainment industry, we would re-mention names like Sandra Fluke, Anita Dunn, Bill Mayer, Keith Olbermann, Rachel Maddow, Dan Rather, certainly also the executive director of Media Matters, homosexual David Brock, whose “alternative” lifestyle exemplifies the sad, self-destructive, incompetent nature of the LGBT crowd (Brock was blackmailed for \$850,000 *by his gay ex-lover*), and so forth – typically, *the* most “progressive” personalities out there. But here we are talking about our own government, or more precisely, the perpetrators within our own governments who have sold America out, economically, morally and socially, for these same insane, wanton desires and unethical, incompetent behaviors. Several dozen come to mind quickly, when thinking of state and local officials, but for the purpose of easy example, i.e., merely referencing officials *only at the **federal** level*, we

would name Rep. Gwen Moore (D:WI-4) and Rep. Jackie Speier (D:CA-12), who appeared recently upon “The View” to directly support Planned Parenthood during the Susan G. Komen thing (thereby also implicating the television show, itself, as well as ABC, and *its* owner, Disney, for potential civil liability herein...), and then you have the **openly** lesbian and gay Representatives (all of whom, *of course*, strongly support “pro-choice” and other economic self-destruction acts at bar herein, including reckless deficit spending and out-of-control debt), such as Rep. Barney Frank (D:MA-4), Rep. Tammy Baldwin (D:WI-2), Rep. Jared Polis (D:CO-2), and also Rep. David Cicilline (D:RI-1), as well as others who are either presumed or suspected in being of that same LGBT crowd, but have not “come out” in public (but, don’t be fooled as to “politics”, because there have been plenty of Republicans snared in disgusting sexual escapades, denigrating and embarrassing our nation with *their own* immorality). The infamous “terrible trio” from California is another perfect example: Sen. Dianne Feinstein, who ascended to power in the wake of assassination; Sen. Barbara Boxer, who has freely used vulgar language directly as *an official part* of her election campaign slogans, and the notorious Rep. Nancy Pelosi, who will always be remembered for willful, flagrant treason against her oath of office, against the United States Constitution, and against America and all of its citizenry, let alone for simultaneously engaging in a shocking sedition, inciting all fellow Members of Congress to overthrow the government of the United States, when – at a pivotal moment enshrined forever in tens of thousands of video copies seen around the world – she *actually* dared to **openly** conspire in **blatant taxation without representation**, by offering up a 2000+ page bill for universal “health

care” which involved a trillion dollar proposed cost (now known to be *double* that cost to taxpayers already, even *before* it gets started...), and yet still flagrantly telling everyone *that it has to be passed first, before* they can read and see what’s actually in the bill, and even *in order to find out later* what’s actually included. This was clear fraud, and it was clear treason, for it is plainly clear that if our Congress enacts *any* bills into law, without ever first *at least reading* the proposed legislation, in this case **admittedly none** at all, then there has been absolutely no representation, whatsoever, within that same taxation. Of course, our federal Congress is no stranger to treason in committing taxation without representation. One only has to look back at the 2008 emergency stimulus/bailout package for a proposed \$787 billion (which also grew...), and remember that nearly every single Member of Congress was plastered all over the mainstream news media during that couple/few weeks, and every single one of them was frantically reporting (confirming) that their own respective constituencies were all against the measure by factors of 30-to-1, 40-to-1, 50-to-1, and *even 90-to-1*, some of them reported on camera. So, therefore, when any Senator or Representative clearly knows that his or her own constituency is overwhelmingly against a legislation, and when that same Senator or Representative also knows the same is true throughout the entire land of America, as confirmed by all fellow Senators and Representatives, and yet *still* goes ahead and votes in favor, there has been clear taxation *without* a valid and reasonable “representation”, for it is clear they were **not faithfully** representing. But, apologies, we digressed from the mere added example of the “terrible trio” of California progressive liberals, Feinstein, Boxer and Pelosi. The point remains that

these types of people are usually very bad for the economy in an entire spectrum of negative ways, precisely because of the immorality, bad behavior, wrong thinking, and erred judgment that results automatically in socially siding with the abortionist and LGBT crowd(s). On the other hand, someone like Sen. Harry Reid (D-NV) seems to be a mixed liberal concoction, by actually voting more “pro-life” than “pro-choice” in abortion issues, yet he acts like the undisputed king of state-sponsored contraception, especially in increasing governmental provisions of condoms, the pill, and other birth control devices, literature and much more out to America’s entire, otherwise innocent youth generations, *not only* dramatically encouraging, but actually *aiding and abetting* teenage sexual promiscuity, and all of the negative repercussions that come with that, including economic damages liability (remember those trillions of dollars lost?), and potential criminal liability for massive promotion of underage sex (depending upon interpretations of certain “ex post facto” aspects in the course of this case). Another quintessential example, of course, is HHS Secretary Kathleen Sebelius, who is known for her unabashed, unethical, sacrilegious and incompetently rabid support in volatile measures towards rampant expansion of the abortionist and LGBT agenda. Her total unfitness for any office of the public trust is clearly manifested by her own actions, including a staunch pro-abortion record as “free world leader” of such things in not only her current position, but also as Governor of Kansas before that, and recently displaying her incredibly gross negligence in such positions and statements like the “reduction in the number of pregnancies compensates for the cost of contraception,” her brand new suite of edicts declaring forced “free” female sterilizations at colleges,

and, of course, trying to force all of the religious non-profits to provide sterilizations, contraceptives, and abortifacients, directly against well-established, Constitutionally guaranteed freedom rights of faith and conscience. She is wholly unfit for *any* office of the public trust, per her gross dereliction of fiduciary duties, her gross negligence, gross incompetence, massive violations of Constitutional religious freedom rights, and so forth, especially her long-term conspiracy, intentional or not, in what eventually became a truly historic economic rape of the entire world. Under the inept watch of Secretary Sebelius is the HHS Office of Population Affairs, headed by her appointee, Marilyn J. Keefe, aided by Susan Moskosky⁴⁴. Created by an Act of Congress in 1970 (Public Law 91-572, 84 Stat. 1504, Dec. 24. 1970), the Office of Population Affairs, under the direction of Keefe, handles all Title X and other “family planning” federal tax dollars through its three (3) sub-components: Office of Family Planning, Office of Adolescent Pregnancy Programs, and Office of Research and Evaluation⁴⁵. Keefe and Moskosky are the entire nation’s perpetrators-in-charge of distributing monies out to the programs and entities that have caused all these economic disasters, i.e., abortion, state-sponsored contraception, state-sponsored sterilization, and etc. Both of them have lengthy professional histories within the “family planning” and/or “reproductive health” worlds. Interestingly, Keefe earned a Master's Degree in Public Health **with a concentration in population dynamics** from Johns Hopkins University in 1993, so she *literally* has no excuses as to the worldwide economic devastation her “healthy” programs have caused. Indeed, the entire Office of Population Affairs is an obvious

⁴⁴ 03-27-2012, <http://www.hhs.gov/opa/about-opa-and-initiatives/opa-organizational-structure/senior-staff>

⁴⁵ 03-27-2012, http://en.wikipedia.org/wiki/Office_of_Population_Affairs

and total disaster, an utter disgrace to the American people, and it should be entirely done away with immediately, along with the permanent terminations of all Title X and other herein-related federal funding, also making sure to properly blame Secretary Sebelius for her role in these disasters, and let's not forget who appointed the immoral economic failure of Sebelius into office in the first place, Barack Obama. When we recall that over 50 million abortions⁴⁶ have been committed since *Roe v. Wade*, we also see that roughly ten percent (10%), or 5 million, of those have happened recently, with just one (1) four-year term under the heavily-likeminded, radical (“progressive”) liberal watch of Barack Obama. *Id.* Indeed, Obama has quite the perverse and lengthy record with an incompetently staunch history of supporting abortion⁴⁷. Naturally, this immoral attitude usually goes hand-in-hand with also supporting the LGBT crowd, of which Obama has plenty of “pride” in doing – indeed, *even* boasting of doing more to support the LGBT crowd than all the Presidents in U.S. History⁴⁸. Exactly like his appointee, Sebelius, and all other politicians referenced above, he is simply not fit to hold the title to *any* American office of the public trust, for his immoral attitudes and policies are revealed in wholly abysmal economic failure. This is **exactly** why Obama and his incompetent promotion of pro-gay “human rights” policies were both soundly ridiculed by most of Africa’s 54 nations, which overwhelmingly ban homosexuality⁴⁹. Obama is certainly not a Christian, nor is he a Muslim. No self-respecting Christian, no self-respecting Muslim, nor any self-respecting Jew, for that matter, would *ever*

⁴⁶ See, EXHIBIT “A”

⁴⁷ See, EXHIBIT “B”

⁴⁸ 07-12-2011, <http://www.lifesitenews.com/news/obama-my-administration-is-most-pro-gay-in-history>

⁴⁹ 12-09-2011, <http://news.yahoo.com/africa-reacts-obamas-pro-gay-rights-foreign-policy-222924148.html>

consider their faiths challengeable, *not even in the very least*, upon either the abortion or LGBT issues. With true Christians, with true Muslims, and with true Jewry, there are no questions or hesitations about the well-known negative impacts of these social diseases. The scripture and doctrine of all three (3) religious faiths are crystal clear: abortion and homosexuality are *not* acceptable, and can *never* be. However, Barack Obama is not the only major 2012 political candidate seeking the White House who is unacceptable, and the Democratic Party does not hold an exclusive monopoly upon immorality, and the resulting abject failure within economic policy, even though its official platform positions, and the positions of its nationwide leader, Rep. Debbie Wasserman Shultz (D:FL-20), would say otherwise. Wasserman Shultz is, of course, rated by HRC at full 100% on pro-gay support, and rated by NRLC at zilch 0% on pro-life⁵⁰ (she is 100% pro-choice and *an active member* of Planned Parenthood⁵¹). She is a poster child for the flawed ideology herein that has economically devastated America, also being a Vice-Chair of the congressional LGBT Equality Caucus (*id.*), with a very lengthy “obsessive compulsive disorder” history for promoting “soup to nuts” abortion. One would think that a woman who went to great length to especially perform her swearing-in oath upon the Tanakh (*id.*) would understand the simplicity in the sixth of Moses’ Ten Commandments (“thou shalt not kill”). It is just as much an outright public fraud for her, an obvious radical (“progressive”) liberal, to somehow be a member of the New Democrat Coalition – *by definition*, a caucus of moderate Democrats – as it is for Mitt Romney to be running “as a Republican” candidate for

⁵⁰ 03-28-2012, http://www.issues2000.org/FL/Debbie_Wasserman_Schultz.htm

⁵¹ 03-28-2012, http://en.wikipedia.org/wiki/Debbie_Wasserman_Schultz

President, and that very revealing statement by him *should* have been the final red flag warning to all people of integrity, honor and conscience. Mitt Romney is obviously not a Republican, as no self-respecting Republican would be willingly in so deep with the dual abortion and LGBT crowd as he has clearly been. Romney is another radical (“progressive”) liberal, with 100,000 abortion notches under his own gun belt watch while Governor of Massachusetts, often described as the “father” (or, is it “mother”?) of the gay marriage movement, for signing the very first perverted gay marriage state laws into effect during the same four (4) years as Governor, *especially* when there was absolutely no legal or formal requirement for him to do so..., his RomneyCare is now exposed as offering free abortions⁵², his record of support for abortion is actually quite lengthy and involved over the years (*id.*), and his record of LGBT activism is so clear and repugnant that over 850 Rabbis have recently denounced him⁵³. Mitt Romney is a clear radical (“progressive”) liberal, and certainly belongs within the shameful likes of the Congressional Progressive Caucus, as he is by no means a valid Republican, nor a valid Republican candidate for the Presidency (which also opens up potential gross mismanagement and/or gross negligence claims against the national party leadership, by the way). Not even a single one of the politicians referenced in this sub-paragraph should be allowed to either retain any office of the public trust, or be qualified for any campaign, race, or election to any office of the public trust. Rephrasing, every single one of these politicians who have been supporting the abortion and/or LGBT agendas should be permanently barred from any employment within any level of government,

⁵² See, EXHIBIT “C”

⁵³ 12-26-2011, <http://www.rabbilevin.com/2011/12/romney-denouced-by-850-rabbis.html>

federal, state and local. By very definition, these immoral, unethical and incompetent politicians have *dramatically violated* the public trust – these are the politicians who have ignorantly drafted, sponsored, voted for, and sometimes enacted fundamentally poisonous legislation for yet *more* abortion, not less, and for yet *more* LGBT agenda goals, not less. These are the politicians who fraudulently rebel against, and therefore mock, even *the basics* of their *own* religious faiths, if any they claim to have, and most of them are really pathetic, constant **liars** in and to the public, routinely flip-flopping their positions and statements as the wind blows. Just like the fact that ultra-liberal The New York Times has had to fire quite a significant number of its former reporters for making up “facts” and even entire stories out of the blue, i.e., fired for **lying**, fired for *willfully* abusing newspaper influence power to *purposefully* **defraud** millions of American citizens, or perhaps we’ve only heard about the ones that got *caught* lying..., these politicians described above, who have routinely supported these most immoral of issues, are also the most consummate of public liars, cheats, thieves and all-around deceivers on everyday issues, too. We know that Planned Parenthood has been now implicated on multiple violations of filing fraudulent paperwork (i.e., lying), we know that the LGBT crowd lies even to itself, as if their alternative lifestyles are either safe, moral, healthy, or not also significant cause in dramatic increase of health care costs. Likewise, Pelosi is so dishonest she brazenly incites mass treason in unread passage of bills into law, Obama is so dishonest that not only did he break well over half of his campaign “promises” to Democrats, but he actually also flip-flopped and sided with the Republicans on several former key “change” issues, and Romney has already been

caught flip-flopping his pandering campaign positions even from one State to the next, just during the current primary season, let alone a well-known “Etch-A-Sketch” record of constant flipping throughout his *entire* political career. These politicians are liars, they are fundamentally immoral, and they simply have no common sense to the big picture of successful economics, *precisely because* they are grossly immoral, which prevents them from being able to think clearly and rationally. They are not fit to hold any role within the public trust, whatsoever, but this is **in addition** to their own civil liability shares herein, for conspiring with fellow abortionists and their LGBT crowd to eventually crash and burn well over \$15 trillion from the prior wealth of America;

e) Another proper sub-class of Defendants includes abortion (and state-sponsored contraception, state-sponsored sterilization, and etc.) doctors with their attending staff, the variously-related “medical services” providers and suppliers, sellers of particular abortion equipment and instruments, and so forth and so on. Whether physically done by medical instruments, or by prescribing drugs and/or other substances, all abortions in the United States are performed by licensed doctors and/or other licensed personnel, which makes these particular Defendants easy to identify and quantify. The same is also true for all cases of state-sponsored sterilization, and, to a lesser extent, for the realm of prescribing and/or dispensing contraception drugs, devices and/or methods. But, in addition to all these licensed “direct servicers” of abortion, and state-sponsored sterilization and contraception, there are also the administrators of all such facilities, the owners, themselves, of all such medical business enterprises, the manufacturers and dealers of particular medical devices, instruments and equipment that are special

and unique to these industries (abortion examples: *see*, The Grantham Collection⁵⁴), the counselors who negligently counseled people towards abortion, or contraception and/or sterilization at state expense, and even online pharmacies like KwikMed.com, which was fast-tracked for selling ella® to an essentially invisible public, i.e., selling it **online** to *anyone* who can fill in web forms and click buttons, which basically loses all substance for maintaining a careful and responsible accountability of dispensing. All such 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, are certainly guilty and liable as “material participants” herein, i.e., as Class Defendants;

f) And then, there are the abortion, contraception and sterilization drugs and drug makers, themselves. Specified here more as legal technicality, the “guilty” drugs lay more within abortion than sterilization, and in sterilization more than contraception. An abortifacient is a substance that induces an abortion, i.e., a “medical” abortion, as opposed to a “surgical” abortion. Nonhospital medical abortions use mifepristone (94%) or methotrexate (6%) as a two-step approach in conjunction with misoprostol, a prostaglandin analogue. Mifepristone is a progesterone receptor antagonist used in the first months of pregnancy for abortion, and also used in smaller doses as an emergency contraceptive⁵⁵. During early trials, it was known as RU-38486, or simply RU-486, its designation at Roussel Uclaf, the company which originally designed mifepristone, a synthetic steroid compound. *Id.* In 1994, at the urging of President Clinton, Roussel

⁵⁴ 03-31-2012, http://abortioninstruments.com/index_instruments2.html

⁵⁵ 03-31-2012, <http://en.wikipedia.org/wiki/Mifepristone>

Uclaf donated all rights for medical uses of mifepristone in the United States to the Population Council in trade for immunity of any civil liability claims (*id.*), apparently already aware of problems, who, in turn, subsequently licensed mifepristone to Danco Laboratories, and the FDA granted approval of Mifeprex (mifepristone) on September 28, 2000. *Id.* The Population Council, based in New York, was founded in 1952 as a eugenics organization, with eugenics advocates as its leadership⁵⁶. That same eugenic function has been carried out for decades, as a “progressive” organization engaged in the full dark spectrum of how to create artificially skewed birth rates around the entire globe⁵⁷, by developing and implementing most of the major methods to interfere with pregnancy and birth (*in addition to more “modern” drug methods, examples include the Copper T IUD, Norplant, Jadelle [Norplant II], and Mirena; Well over 50 million Copper T IUDs have been distributed in over 70 countries; Norplant was replaced by Jadelle*), yet still always specializing on providing their focused attention and types of services to “the poor” within nations and communities. *Id.* Indeed, the official website of the Population Council brazenly claims that population growth is a “challenging problem” to foment these same “reproductive health” services⁵⁸. The offices of Danco Laboratories, a single-product company created for distribution of Mifeprex, are also in New York City, coincidentally, and are under an unlisted phone number and a post office box for security purposes⁵⁹. As of May 2006, when the FDA began reporting cases of women suffering from adverse effects of RU-486 (Mifeprex in the U.S., sold

⁵⁶ 04-01-2012, http://en.wikipedia.org/wiki/Population_Council

⁵⁷ Cf. “economic warfare” by named Class Defendants, exemplified *supra*, paragraphs 26-27 at 9-10.

⁵⁸ 04-03-2012, <http://popcouncil.org/what/index.asp>

⁵⁹ 04-03-2012, http://en.wikipedia.org/wiki/Danco_Laboratories

solely by Danco), already some 1,070 events were recorded, including six deaths, 9 life-threatening incidents, 232 hospitalizations, 116 blood transfusions, and 88 cases of infection⁶⁰, and those numbers have grown considerably since 2006, now tied to at least 13 confirmed deaths, 9 of which were reported in the United States. *Id.* Now, we can understand why the FDA refused to identify the manufacturer when it approved mifepristone, saying it feared for the safety of the drug plant and its workers⁶¹, and with good reason, because it turns out that the two companies who manufacture the raw compound for all the [RU-486/mifepristone/Mifeprex] used in the U.S. are both Chinese plants, including Shanghai-based Hua Lian Pharmaceutical Company (*id.*), which was, naturally, funded by the Rockefeller Foundation (*id.*), the same entity that created the eugenics-founded Population Council to begin with⁶². In other words, the communist, currency-manipulating, forced-abortion/one-child policy nation of China, which has repeatedly called for replacement of the U.S. Dollar as the world's reserve currency, has long been getting fat rich in peddling both human death and fundamental economic warfare within, and against, the United States, conspiring with these very same secretive organizations to first pave the way, or so it would appear... Planned Parenthood is very proud for its development role⁶³ in unleashing the newer “morning after” pill called ella®, which chemically is known as *ulipristal acetate*, and functions as a progestin-blocker, or “selective progesterone receptor modulator” (SPRM), which is why it functions so similarly to mifepristone. Indeed, all these such “morning after”

⁶⁰ 08-13-2010, <http://www.lifesitenews.com/news/archive/ldn/2010/aug/10081314>

⁶¹ 02-11-2009, <http://www.cbsnews.com/stories/2000/10/13/tech/main241112.shtml>

⁶² 04-01-2012, http://en.wikipedia.org/wiki/Population_Council (repeated from prior use)

⁶³ 12-03-2010, <http://www.lifenews.com/2010/12/03/nat-6906>

variants, or “emergency contraception pills” (ECPs), from ella®, manufactured by Watson Pharmaceuticals (*id.*), to the many brand names of levonorgestrel-only ECPs, like Escapelle, Plan B, Levonelle, NorLevo, Postinor-2, i-pill, Next Choice, and 72-Hours⁶⁴ (and their respective pharmaceutical manufacturers), to dozens of others using combined progestin and estrogen ingredients⁶⁵ (and their respective pharmaceutical manufacturers), are all proximately liable in the civil damages herein, for inducing two (2) major “significant contributing factors” of the economic devastation of America: for what are actually clear *abortifacient pills* because conceptions will have already occurred in many cases, prior to the new mother-to-be ingesting the fatal-to-embryo substance, and dramatically sponsoring and increasing the whole speed and rate of the guilty matters herein, by targeted lobbying towards favorable drug-selling legislation, donating to political candidates who will ramp up rates of abortion, contraception, and sterilization, and especially promoting any state-sponsored/compelled usage of their fatal products, i.e., so their sales increased, creating *much* higher, unnatural gaps and skews in birth rates from what would otherwise have resulted, and so forth and so on, all directly and fundamentally leading towards the worldwide economic devastation therefore inevitably and eventually experienced a few years ago. From eugenicists to secret companies, from rogue nations to pharmaceuticals, they are all a Class herein;

g) Again, this case is not religious, moral or political, but it is an **economic** case, as pro-choice groups *equally liable* to all the “top offender” Defendants for civil damages herein have fraudulently existed *within* the Church, itself, too, including such entities

⁶⁴ 04-03-2012, http://en.wikipedia.org/wiki/Levonorgestrel#Emergency_contraception

⁶⁵ 04-03-2012, <http://ec.princeton.edu/questions/dose.html#dose>

as Catholics for Choice, the Religious Coalition for Reproductive Choice, the national Clergy for Choice network, Spiritual Youth for Reproductive Freedom, the National Black Church Initiative, and La Iniciativa Latina, to name but a few such examples of foolish wolves lurking out there within the faithful flocks of innocent lambs. Let them be keenly spotted by all shepherds, who will bringeth forth the proverbial pitchfork, sword, and bow, and let them reap fully in righteous measure from the evil economic destruction they have sown by their own untamed tongues, done in willful defiance of their *own* written copies of His promising Word, for the utter hypocrisy *is* shameful.

47. Accordingly, after describing an entire plethora of eligible (liable) sub-classes of Defendants above, once again a recall, or rather, an updated rephrasing of ¶ 19, *supra*, seems most appropriate: per each given, particular Defendant **type**, will they now be adjudged either “active” or “passive” in individual or corporate function towards abortion and/or state-sponsored contraception, etc., was there “material participation”, just what exactly will now constitute engaging in a “significant contributing factor” leading to civil damages, penalties, and/or other relief herein, will any of that *really* matter in proffered defenses, when, in the end, even any “luckiest” single, particular Class Defendant to get away with a comparative analysis judgment of only one-tenth of one percent (**0.1%**) fault contributed, a ratio so ridiculously low as to be instantly laughable, would *still* result into an astronomically-whopping fifteen billion dollar (\$15B) judgment herein... against *just* that **one** “luckiest” Defendant to “get off so incredibly easy”... and, probably the most important question of all: Shouldn’t there really be *different sets* of forms, amounts, and types of relief ordered, as most applicable to **each different type** of Class Defendant?

48. Well, *of course* there should – and must – be different types, levels, and forms of relief issued against the several different types, or sub-classes, of Defendants. While both the national Democratic Party, and *all* of its federal/national leadership, are *all* officially self-admitted and/or well documented in the most prominent overall liability herein, and rightfully should be THE most prosecuted Defendant of all tens of thousands of described Class Defendants, prosecuted stronger than against any of the ten (10) formally-named Defendants (for the Democratic Party has been the overall conduit, or “central hub”, for all of these nefarious actions over the decades, systematically “legalizing” these horrific, catastrophic economic failures into materialization, and providing the political platform with which to further “progress” such sabotage against America...), it just wouldn’t be fair, right or equitable to carry out an otherwise lawful and proper financial compensation punishment against every single penny the Democratic Party has in all of its instruments and accounts everywhere..., because that would also result in effectively disenfranchising millions upon millions of innocent Democratic voters and supporters. However, that is *not* also to say that certain key guilty parties within the Democratic Party cannot be held liable to the very fullest extent of the law. Likewise, you just can’t go around, even under perfectly lawful consequences otherwise, in suddenly declaring hundreds or thousands of political candidates across the nation running for office election later this year, or several hundred currently-sitting officials, to all now be immediately kicked out of office for any amount of abortion and/or LGBT support at ratings including 51% and higher. Instead, there should be weighed balance in equity of the overall consequences, suggesting that maybe *only* those current candidates and sitting politicians who have recognized ratings

of perhaps 70%, 75%, 80% or 85% in *both* social issue categories should be persons now punished as banned from service within the public trust. However, again, that is *not* also to say that reasonable fines, fees, or other financial liability should not be doled out in at least perfunctory fashion to any and all of the more severe perpetrators and violators of the public trust herein. Likewise again, the recent intention of Susan G. Komen to do what was *actually the right thing all along* (stop funding abortionist Planned Parenthood) is commendable, should be applauded, and therefore generously rewarded by diverting any punishment to befall upon that primarily breast cancer advocacy organization, yet, to the contrary, the various Foundations, PACs, corporate and individual donors who have consistently funded abortionists without regret or remorse should be punished in large financial measure, relatively speaking. By further examples, the declaratory relief to be issued in regards to dissolving abortion facilities and creating adoption facilities in trade is significantly different than the kinds of declaratory relief that is reasonably required in regards to the liable news media, their owners and star reporters/anchors, which is a bit different than that reasonably required for the American entertainment industry, its star personalities, shows, production companies and others who are proximately guilty herein, for all their combined culpable liability in very heavy promotion of abortion and LGBT issues. Even still again, the individual sitting politicians and current candidates for office should be treated different in scope of penalties than, say, entire governmental units like the Office of Population Affairs, which should be completely terminated in utterly total, catastrophic disgrace. Once more, the struggling, single mother of two kindergarten age children who has merely been additional front desk help at an abortion clinic for her eight

paid hours a day plus a 45 minute break for lunch should, surely, be punished *not at all*, yet administrators and owners of all such facilities must pay *the full price* for their roles within the recent global economic destruction. Exemplified once again, there should be a difference in scope of overall treatment betwixt a political pawn like Sandra Fluke, who knowingly commits fraud under oath in front of an intelligent Congress, versus a sick mind like Bill Mayer, who promotes socialism into an audience of millions already fairly immoral on the Left, versus fellow purveyor of comedy-comment Ann Coulter, who sold out her Republican soul to join with the radical (“progressive”) liberals of GOProud and related LGBT crowd agendas to deceive an audience of millions on the Right, versus the treatment prosecuted against Frances Fox Piven, an iconic American professor of highly radical progressive liberal political science and sociology⁶⁶, also an honorary chair of the Democratic Socialists of America (*id.*), known for a notorious paper advocating increased enrollment in social welfare programs in order to collapse those systems... (*id.*), who just recently told the packed auditorium at Left Forum 2012, the annual pep-rally for liberal thought, that “Democrats, Socialists, Communists, and Anarchists” are *already* together to transform America, i.e., to **literally** overthrow the government of the United States⁶⁷.

49. YES, indeed: there is *not only* an overwhelmingly-sufficient “class” of defendants all tied either directly and/or indirectly to the causes of damage herein, there are actually several – at least several – differently segregated sub-classes with which the Court could more reasonably apportion the most applicable and proper form(s) of relief per each

⁶⁶ 04-06-2012, http://en.wikipedia.org/wiki/Frances_Fox_Piven

⁶⁷ 03-22-2012, <http://www.theblaze.com/stories/democrats-socialists-and-communists-we-are-all-together-piven-draws-chilling-connections>

various “type” of Class Defendant, and, of equal importance, how much money does a particular putative Class Defendant have? Because, let’s cut to the chaff, and talk brass tacks: The point of this lawsuit is economic devastation, which requires compensation, and because we’re talking about trillions in damages, the compensation total finally then acquired must be adequate and reasonable, given the overall circumstances to work with.

50. **As a clear reminder**, this Relator is NOT seeking even one single red cent penny from any of the formally-named Defendants, nor either from any of the putative Class Defendants, *for himself...* ALL OF THE POTENTIAL CLASS DEFENDANTS, AND ALL OF THEIR AVAILABLE MONIES, PROPERTIES AND OTHER ASSETS, ARE STRICTLY INTENDED FOR THE PLAINTIFF GOVERNMENTS TO RECOVER AS RIGHTFUL COMPENSATION, TO WHATEVER EXTENT THIS COURT AND THE PLAINTIFF GOVERNMENTS FINALLY DECIDE IS FAIR AND APPROPRIATE ON BEHALF OF ALL FEDERAL, STATE AND LOCAL CITIZENS REPRESENTED.

51. Clarifying that extremely important point once again, this Realtor is fully content to focus only upon his *qui tam* (“whistleblower”) award for a statutory-minimum 15% of the related taxpayer funding herein (Title X, certain currently-spent portions of Medicaid, etc.) being now terminated as horrendously false claims. Realtor is fully content with the many millions he will receive, and so all of the billions upon billions upon billions upon billions of potential compensation from putative classes of defendants out there are ALL for, again, the federal government Plaintiff, the 50 state government Plaintiffs, and for the intended third-party beneficiaries herein, the over 3000 American counties and the over 30,000 incorporated cities and towns in our nation, to help restore their public finances.

52. If there are to be any financial liability levels distinguished between the various types of numerous Class Defendants, then it is the entire “top offender” or “principal” group that surely remains at full one hundred percent (100%) financial liability, even while certain other types of Class Defendants are also properly identified as liable in full, especially including any person, organization, promotion, device, instrument, drug or any other thing which is fairly recognized as existing and/or operating for the express, sole purpose of assisting or facilitating abortion-on-demand, state-sponsored contraception, state-sponsored sterilization, and/or other such directly-related damages raised herein.

53. For international pro-choice/abortion organizations, the people, buildings, assets and other tangible property that are physically located within United States jurisdiction, and all financial accounts, instruments, funds and any monies, stocks, bonds, and etc., held by any financial institution within any United States jurisdiction, seems fair game.

54. So, then, the question really becomes: Just HOW MUCH will it take to fulfill an “adequate and reasonable” amount of compensation for the Plaintiff governments in this unique and historical circumstance, when, again, the baseline amount sought herein is a staggering \$15 trillion loss, and, if you recall just a few other basic gigantic additions to that (*see* Introduction, ¶¶ 6-9, *supra* at 3), the reality is at least a solid \$25 trillion total loss involved, if not yet way more (and, still *not* counting securities and derivatives)...?

55. Let’s compare to get an idea. On 9 February 2012, the U.S. Justice Department, jointly with State Attorneys General, announced their \$25 billion agreement with the five largest mortgage servicers to address mortgage loan servicing and foreclosure abuses⁶⁸,

⁶⁸ 02-09-2012, <http://www.justice.gov/opa/pr/2012/February/12-ag-186.html>

yet compared to the \$14.0 trillion loss in home values because of the bubble crash that that settlement amount is ostensibly in regards to, it only represents a miniscule fraction of the actual damage, less than one-fifth of one percent (0.1786%), i.e., *barely negligible* (but, to be fair, these mortgage servicers were only sued by the DOJ about certain and limited issues within the industry, not for the whole ball of wax gone sour in the crash).

56. Obviously, the American people will demand a much higher percentage than that as an “adequate and reasonable” amount of compensation for the worst crime in human history ever committed... Perhaps the Court and Plaintiff Governments will consider the American people possibly satisfied with total reparations at 3-5% of the losses, perhaps not. Consider that ($0.03 \times \$15T = \$450B$), that ($0.05 \times \$15T = 0.03 \times \$25T = \$750B$), and that ($0.05 \times \$25T = \$1.25T$). Accordingly, that would suggest the target range of between one-half trillion to one-and-a-quarter trillion in compensation to be acquired by the government parties, after all is said and done. Coincidentally, an amount of roughly one trillion dollars is approximately what it will take to shore up the numerous pension funds of our nation’s counties, cities and towns. Further, as local governments begin to replenish and restore their own financial affairs, so the States and Commonwealths, who are directly impacted by any and all economic ripples of their “child” localities, will also begin to fare better in their budgetary outlooks, and likewise again in the directly similar relationship between *them* and the Federal Government, which will financially benefit as well, even enjoying a dual/double effect with its *own* relationships to the same localities.

57. Even targeting only one-half trillion (\$500B) as the total in reparations would still do amazing wonders for these ailing locality pensions, and would still greatly benefit all

levels of government, and therefore positively impact *every* citizen, *every* business, *every* bank, and all other interdependent financial cycles (consumer sales, increased investing, and etc.). In essence, every dollar acts like \$4-5, as these ripples make their way around.

58. Moreover, it is the local governments – again, the primary intended beneficiaries of this lawsuit – who are unquestionably the best suited administrative entities to handle the vast majority of all physical acquisitions in compensation, i.e., buildings, vehicles, lands, equipment, supplies, materials, and so forth, especially when you are talking about, literally, tens of thousands of amenable Class Defendants, of several varieties or types, located throughout and across the entire nation. Without a doubt, the Federal, State and Commonwealth Plaintiff Governments will surely assist the localities in whatever matters are required to process these acquisitions, as needed, and there are certain kinds of the Class Defendants, and/or certain legality aspects *of* them, that will require a state-level or federal-level “touch” to fully complete, especially expected with larger financial accounts like the guilty PACs, Foundations, and so forth, in dealing with the relatively few guilty politicians, officials and similar others, processes involving international organizations, foreign organizations now liable to Plaintiff Governments, and even rogue nations that might have to be dealt with in completely different realms like the World Court, and etc.

59. To be quite sure, this Relator certainly did NOT draft out and refine the last thirty (30) pages herein, describing all of the numerously-amenable Class Defendants out there, just for his own personal amusement, or to waste the Court’s time. It was to provide a mere **fractional, partial glimpse** into the **vast sea** of compensation readily and rightfully available, perhaps the first few hundred billion as without even having to dig very deep.

60. For example, *just* the single national headquarters entity of Planned Parenthood is worth in excess of a full billion dollars, all by itself. The other nine (9) formally-named Defendants, just those other *named* abortionists, add up to roughly another couple or few billion dollars, perhaps more. As aforementioned, a rough estimate of all their numerous state and local abortionist chapters, affiliates, partners, members, etc., is believed to be somewhere between 8k and 14k entities (which could be many more), and so there is also another five to twenty billion available for compensation, perhaps even double or triple or quadruple that, once they are all accumulated. And, don't forget – all of those are *just* what are formally related to the ten (10) formally-named abortionist Defendants, but yet, there are plenty more “national” abortionist organizations out there, and all of *their* state and local partners-in-crime. Many billions more are rightfully gleaned from the hundreds or thousands of guilty Foundations, Networks, PACs, “super PACs”, larger corporate and individual donors, and all other financial instruments which directly funded the historical devastation herein. Anyone can easily find out online that Soros is worth at least \$22B⁶⁹, Bloomberg is at least \$19.5B (*id.*), and that same Forbes list of the 400 richest American multi-billionaires contains quite a significant number of persons who have contributed very large funding to the abortion and LGBT causes, i.e., “sponsored domestic terrorism” against the economies of the United States and the entire world, i.e., who also have *some* partial amount of liability herein. The Bloomberg billionaire index page updates similar data daily⁷⁰. Taxpayer wastes for Sandra Fluke can be shut down, *immediately*, because the public should not be funding any tramp fraud wanting to expand a professional lying

⁶⁹ 09-21-2011, <http://www.forbes.com/forbes-400>

⁷⁰ 04-08-2012, <http://topics.bloomberg.com/bloomberg-billionaires-index>

career into *our court system*... SKDKnickerbocker, the liberal PR firm which staged Ms. Fluke into the media, is owned and managed by some very wealthy “progressive” people, and the firm has been behind quite a number of campaigns for issues and candidates that are now putative Class Defendants herein, and Anita Dunn, senior partner at SKDK, and apparent supporter and believer of infamous communist Mao Tse-Tung, is such a lying snake-in-the-grass that she has also, herself, donated freely to EMILY’s List⁷¹, yet has attacked Romney’s deplorable record in and for her exact same pro-abortion failures⁷².

61. A quick run-through of *just* the previous thirty (30) pages in **brief examples** of Class Defendants, investigated online, reveals: Bill Mayer is worth \$23 million, HBO topped \$1 billion in international revenue last year, as part of Time-Warner’s overall \$29 billion, Keith Olbermann is worth \$35 million, Rachel Maddow is worth \$12.5 million, MSNBC had \$375 million in revenue, part of NBCUniversal’s overall \$17 billion, Dan Rather is worth \$70 million, CBS had revenue of \$14 billion with assets of \$26 billion, The Washington Post had revenue of \$5 billion with assets of \$5 billion, The New York Times Company had revenue of \$2.4 billion with assets of \$3.3 billion, New England Media Group (The Boston Globe) had revenue of \$389 million, Gay & Lesbian Alliance Against Defamation (GLAAD) had income of \$6.5 million with assets of \$10.5 million, the revenue and assets of National Lesbian and Gay Journalists Association are unknown, Media Matters had \$14.6 million in revenue with assets of \$11.5 million, David Brock’s multi-millionaire net worth is unknown, Rep. Gwen Moore (D:WI-4) is worth at least

⁷¹ 04-09-2012, http://www.washingtonpost.com/politics/anita-dunn/gIQAVmxDAP_topic.html

⁷² 04-09-2012, http://townhall.com/tipsheet/greghengler/2012/02/07/anita_dunn_gov_romney_did_nothing_about_massachusetts_assault_on_freedom_of_conscience

\$130k, Rep. Jackie Speier (D:CA-12) is worth at least \$20.5 million, The View's worth is unknown (*but the show's hosts are all rich: Barbara Walters at \$150 million, Whoopi Goldberg – who has also **promoted Communism** upon their show – is worth at least \$48 million, and the others all have roughly \$10 million or more*), ABC is the very largest broadcaster in the world by revenues, Disney had \$41 billion in revenue with \$72 billion in assets, Rep. Barney Frank (D:MA-4) is worth \$4.6 million, Rep. Tammy Baldwin (D:WI-2) is a millionaire, Rep. Jared Polis (D:CO-2) is worth at least \$56 million, Rep. David Cicilline (D:RI-1) is a millionaire, Sen. Dianne Feinstein is worth \$94 million, Sen. Barbara Boxer is worth \$5 million, Rep. Nancy Pelosi is worth somewhere between \$23 million and \$196 million, Sen. Harry Reid is worth \$6 million, Kathleen Sebelius is worth \$5.6 million, the net worth of Marilyn J. Keefe and Susan Moskosky are unknown, the net worth of Barack Obama is at least \$10.5 million, Rep. Debbie Wasserman Shultz (D:FL-20) is a millionaire, Mitt Romney is worth somewhere between \$250 million and \$515 million, the revenue and assets of KwikMed are unknown, the Population Council had revenue of \$122 million and assets of \$182 million, Danco Laboratories is kept so (unlawfully) secret that even basic, cursory financials cannot be found online, China has roughly \$3 trillion in foreign exchange reserves, half of which are in Dollar-denominated accounts, and also has *at least* 1350 tonnes of gold (\$80 billion), Watson Pharmaceuticals had revenues of \$4.6 billion, of the various examples of birth control methods developed by **specific** partnership with the Population Council, there are the Copper T IUD (which has but one (1) approved U.S. version, ParaGard), Norplant, Norplant II, and Mirena, which directly involve or implicate the giant medical companies GynoPharma (originally

GynoMed), Ortho-McNeil, Janssen, Johnson & Johnson, Duramed Pharmaceuticals, Barr Pharmaceuticals, Wyeth Pharmaceuticals, Schering Oy (*Schering-Plough, later Merck*), and Bayer AG (well known for its brand of aspirin), so that's another entire class of many billions upon billions upon billions, plus there is also the liable Hua Lian Pharmaceutical Company which has assets worth at least 232.18 billion yuan, the original creator of most of this mess, the Rockefeller Foundation, which has an endowment currently worth \$3.5 billion, the other main "emergency contraceptive pills" like Escapelle, Plan B, Levonelle, NorLevo, Postinor-2, i-pill, Next Choice, and 72-Hours, which then directly involve or implicate (or multi-involve, or multi-implicate) Richter Gedeon Pharmaceuticals, Teva Women's Health, Women's Capital Corporation, Schering(-Plough, i.e., Merck), Watson Pharmaceuticals, Win-Medicare Limited, HRAPharma, Tunggal Idaman Abdi, and Cipla Limited and others, once again dramatically increasing the available pool of billions upon billions upon billions, and of the **oxymoron** "religious pro-choice" defendants exemplified above, Catholics for Choice had a budget of \$3 million with assets over \$7 million, the financials for the Religious Coalition for Reproductive Choice are unknown, but liability would also include its three dozen some member organizations⁷³, as well as from its other projects, i.e., the national Clergy for Choice network, Spiritual Youth for Reproductive Freedom, the National Black Church Initiative, and La Iniciativa Latina, while turncoat Ann Coulter is worth \$8.5 million, the revenue and net worth of GOProud is unknown, as is sadly also the case for Frances Fox Piven, the communist professor icon of the *ultra-radical* Left, although it is known she was paid a \$144,810 salary in 2010. The "over 100

⁷³ 04-12-2012,
http://en.wikipedia.org/wiki/Religious_Coalition_for_Reproductive_Choice#Member_organizations

partner organizations from over 50 different countries” in numerous partnerships with the named Defendant, Center for Reproductive Rights, presents yet another whole block of billions upon billions, pro-choice organizations have their general consensus of just under 2000 various abortion facilities – all of which are assumedly lucrative ventures, and also putative defendants as a multi-billion class itself – operating within the United States, and the utter disgrace of the Office of Population Affairs, part of the equally-guilty Office of Family Planning, is simply to be terminated along with all Title X funding and portions of Medicaid/Medicare, saving those *hundreds of millions of dollars* from ever being spent again, *year after year*, something that has **already** falsely and fraudulently taxed America many billions upon billions since its terrible, horrible, poisonous inception in 1970...

62. And, all of *that*, ALL of the above particularly-named people and things, is JUST the *beginnings*, the highlights of the more prominent EXAMPLES, when there is and are so many and much more... and yet, we’re **already** up to a healthy range of \$45-70 billion for ONLY the “pure” abortionist types, the “top offenders” Class, i.e., named Defendants and their various state and local affiliates, foundations, PACs, and similar entities. AND, we’ve also identified a nice range of around \$350-400 billion from just the particularly-named examples from the other sub-class of putative defendants. So far, for the various Plaintiff Governments and their child locality governments, that’s **\$45-70 billion**, maybe more, in full, total, 100% judgments for “top offender” compensations/reparations, plus **another \$300-350 billion identified**, possibly more, in which the Plaintiff Governments and all their child locality governments can receive *some* level, percentage, portion in fair and rightful compensation, perhaps, *even likely*, several “tiers” of percentage judgments.

63. Even further, we didn't bother to cover ANY example of named abortion facilities or their administrators or owners yet, we didn't cover ANY examples of equipment and device manufacturers yet, not one single example of variously-related medical suppliers, not one single example of the educators and trainers within and for the abortion industry, no mention of associated patent lawyers/firms, nor the attorneys/firms that have argued for more abortion agenda items and/or more LGBT agenda items, not even a remote blip about any particular judges who have made the grievously-devastating, and contributing, rulings along the way for more abortion, more contraception, more sterilization, and more LGBT agenda. Certainly, let us **not be bashful** when we're talking about **trillions** of our dollars – if any of the seven (7) Justices of the Burger Court that ruled in favor of *Roe*, unleashing hell upon earth, were still alive today, *they* would be putative defendants, *too*.

64. Relator would like nothing more than to provide yet further named examples of the American media and entertainment industry who are also liable, such as Katie Couric, who apparently took great “pride” in headlining/keynoting the 8th Annual Convention of the National Lesbian and Gay Journalists Association⁷⁴, declared herself a (n intended “progressive” or “radical”) feminist at the 2008 Intrepid Awards Gala, hosted by best-buddy and formally-named Defendant NOW⁷⁵, has a clear, staunch “pro-choice” record for abortion (*id.*), and was last known to be worth at least \$55 million, ABC's Diane Sawyer is worth \$40 million with an annual salary of \$12 million, Nightly News anchor Brian Williams has a net worth of \$30 million with an annual salary of \$13 million,

⁷⁴ 08-30-1999, <http://www.commondreams.org/pressreleases/august99/083099c.htm>

⁷⁵ 07-21-2008, <http://newsbusters.org/blogs/matthew-balan/2008/07/21/katie-couric-now-gathering-i-am-feminist>

Today show host Matt Lauer has a net worth of \$45 million with an annual salary of \$17 million, “Material Girl” Madonna is worth at least \$650 million, with annual revenue averaging well over \$50 million to boot, liberal Barbra Streisand is worth \$140 million, Cher is worth \$200 million, and etc., but those kinds of lists could easily encompass yet another several pages inserted right here... and we would still only be giving *example*...

65. Indeed, and besides the base (100% judgments) pot of \$45-70 billion, that initial range of “percentages pot” \$300-350 billion quickly grows to \$400 billion, \$500 billion, \$600 billion, or more, by the time all the combined wisdom, experiences and skills of the Court plus variety of learned counsel are all formally involved herein, for surely they all know much more about these things than does the mere undersigned Relator. Further, we *haven’t even yet begun* to talk about the REALLY BIG monies out there, such as what to do about **China** and its heavy liability herein. That Hua Lian Pharmaceutical Company which now has assets worth at least 232.18 billion yuan? (That’s *just* the assets, not the revenue!) As of current writing, that amount is equivalent to \$36.85 **billion** USD. Then also, NOT counting China’s national assets or treasury, buildings, lands, or anything else like that, but ONLY its current amounts of foreign currency exchanges floating around the world in various stock markets and other large financial instruments, that amount is worth roughly \$3 trillion USD, half of which are actually held within Dollar-denominated accounts, so there’s another \$1.5 trillion that can *at least* be talked about, for surely the rogue nation of China has been acting very naughty against the United States and other industrialized nations, with its incredible amount of long-term manufacturing, and then worldwide distribution, of the various poisons and economic warfare discussed herein.

66. Speaking of trillions..., let's talk about the Fortune 2000 Global List, or at least the guilty and liable ones herein, out of all 2000 of those top-earning global companies accounting for the lion's share of the entire world's annual revenue (world GDP), for while a lesser number of them have unethically indulged in any public/corporate/official support for the LGBT agenda, quite a significant number of them have very generously donated and additionally supported "reproductive health" and even outright "pro-choice" campaigns, i.e., instead of just "mere" billions and billions within a monetary pot now to be investigated further, there are actually **trillions upon trillions** within that *exact, same* monetary pot... Thankfully, Fortune Magazine has created an excellent and most useful online database webpage, complete with adjustable parameters and dynamic updates, for that same 2000 Global List⁷⁶. A cursory review of said List in its default online layout yields all those 2000 different companies in a straight listing, spread across twenty (20) pages (100 companies per page). Clicking twice upon the "Assets" header link resorts the entire list to display a descending order, starting with the company that apparently has the highest amount of total assets, Fannie Mae (over \$3.2 trillion), and by running down the list from there, we see that another dozen very large companies are EACH worth at least \$2 trillion – that's *trillion* – plus another dozen are worth over \$1 trillion apiece, yet another thirty (30) companies are each worth over one-half trillion dollars, and you have to skip to a full couple pages later (yet another 150+ uber-rich companies later...), before you finally even get "as low as" the "paltry" \$100 billion mark in assets. Even still upon just page THREE of this important list, you are *already* up to an astonishing amount of

⁷⁶ 04-18-2012, <http://www.forbes.com/global2000/list>

eighty-eight trillion dollars (\$88 trillion USD), and yet there are *still* another seventeen long pages left to go, each displaying *another* group of 100 global *billionaire* companies, totaling up to *yet another* forty-to-fifty trillion dollars (\$40-50 trillion USD), for a final whopping total of roughly **\$130 TO \$140 TRILLION** – and, that is *just* for the assets, without even bothering to mention the additional, staggering, many trillions upon trillions upon trillions of dollars in their combined annual revenues...

67. Of course, not every one of those gigantic companies are guilty and liable herein for “material participation” or “contributing factors” in supporting abortion-on-demand, state-sponsored contraception, state-sponsored sterilization, the LGBT agenda, and/or proximately-related matters, and not every single one of those are American companies, for that matter. Still, a large number of even the liable companies *not* based within the United States *have*, in fact, their “North American operations” headquartered somewhere here in the U.S., because they do quite a significant amount of their business here within the States, and are likewise also heavily invested and engaged with, and very responsive to, the fluctuating value of our United States Dollar (as the world’s reserve currency).

68. With that higher understanding, you must begin to realize that these extra-special entities under consideration, such as an entire defendant nation like China, or any one of these unfathomably-wealthy, liable, defendant global conglomerates on the Forbes 2000 list, actually all enjoy **an unusual financial privilege** within the context of these matters.

69. Simply put, these entities are *sooo* incredibly large, in relation and relative levels of financial proportion to America and its overall economy – and therefore, relationship directly intertwined with the actual, real and perceived value of the U.S. Dollar – that the

ostensible “punishment” of this Court declaring judgments against these mega-companies in a uniformly-spread amount of, say, 2% of net worth for each company liable for their support of “reproductive health”, “pro-choice”, outright abortion, and/or similar matters, with an independently-ordered one percent (1%) for each such mega-company liable for their support of the LGBT agenda [i.e., some of the liable mega-companies are ordered to pay 1% of (just..) their assets, most at 2%, and a few of them the full 3% of their assets], *actually* ends up, after all is said and done, of being one of the very best *investments* that those companies ever made, equivalent to an eventual ROI (“Return On Investment”) of somewhere between at least 200% and 500%, all fully returned within less than a single year’s time... i.e., one of the *VERY best* investments those companies could have ever even *thought* to make. For now, you also *finally* understand the bigger picture – once this Court issues its said such “punishment” in variously-determined, exact dollar amounts, equating to the either 1%, 2%, or 3% judgments as just previously described, against all of the identified-in-liability mega-companies (along with the real, and variously-tiered, financial punishments issued out against the previous thirty-plus pages in other classes of defendants herein), and an actual, historical, juggernaut amount of roughly one trillion dollars is recompensed back into the various public treasuries of the United State local governments, which then ripples like \$4-5 dollars in positive measure throughout public pension funds, in the 50 state governments’ budgets, in the federal government, and in resulting parallel positive measure for all U.S. citizens and businesses, etc., etc., then the actual, real and perceived value of the U.S. Dollar will near-instantly gain a very sizable increase of no less than 5 to 8 points – hence *greatly benefitting* those same companies.

70. To be sure, all the other mega-companies who are *not* liable for these matters will, in fact, *also* greatly benefit from this exact same process, as – again – so will American citizens, all the other “normal” businesses, the public in general, even other nations and *their* citizenry and businesses, too (again, the Dollar is the world reserve currency), but *fair is fair*, the most liable companies *should*, in fact, pay their fair and reasonable share herein, they will still realize a relatively-quick and very sizable ROI on their contribution, anyway, the entire financial “pay it forward” transformation results in a win-win-win, all the way around the proverbial table, for literally everyone and everything, everywhere, PLUS, it can all actually happen and materialize in less than even a single year’s time, because this Honorable Court, once duly informed and advised within the full premises, may thereafter issue its any and all temporary, emergency, intermediary and permanent orders whenever it best suits the Court, and the Court may, of course, declare that such compensations be fully paid and/or otherwise rendered within whatever reasonable time range(s) that the Court, in its great wisdom, would select as most appropriate therein.

71. Indeed, the ROI for such liable mega-companies is *sooo* strong and attractive, that even some of the **non**-liable mega-companies might want to “get in on that action,” too, and perhaps the U.S. Federal Government could work out a mutually-benefitting deal for any and all such takers, like, oh I don’t know, maybe slashing their U.S. corporate tax rates down to reasonable and globally-competitive levels of, say, 7-10-12-15%, in return for making substantial “capital investment” deposits with the U.S. Treasury? Perhaps the U.S. Federal Government will finally come to its recently-dimwitted senses, and slash all of the U.S. corporate tax rates to size, *where they should have been all along*, damn it...

72. Accordingly, wherein one might have previously laughed and rolled their eyes at the very mention of somebody suing for “fifteen trillion dollars” – or for discussing “a trillion dollars” in judgments for just a single lawsuit – we now all understand the bigger picture, we see that \$15 trillion is not only NOT a laughable amount, but, in fact, it is actually *well below* the true amount of roughly \$25 trillion in American losses (and, that is *just* direct losses, i.e., the United States’ share of the “M1 money supply” lost in 2008, and does *not* count vastly larger amounts as would be discussed for M2 and M3 money), plus we have also now learned that *not only* is a full trillion dollars in judgments actually doable, actually *quite* feasible, actually **fairly easy** to consider and framework up... but, indeed, that actually may be the *only* reasonable solution available, and even *necessary*.

73. However, before we conclude our opening discussions regarding formally-named Defendants and all of the available putative Class Defendants out there, Relator is fully obliged to present one more method of viewing what is easily argued as the most primary cause of direct financial damages herein, i.e., abortion-on-demand, by determining just what exactly has been the actual “**unit cost of abortion**” here within the United States.

74. Common knowledge reminds us all that, within the United States since the 1973 ruling of *Roe v. Wade*, there have been *at least* 50 million abortions performed. The year by year statistics contained within **Exhibit “A”** inform us that the total to present day is, in fact, *at least* 52.2 million *reported* abortions (repeating the 2008 figure as the same again for the incomplete 2009-2011 statistics). However, many or even most “pro-life” advocates would quickly argue that the annual collection of abortion statistics has NOT been 100% reliable, not even *reasonably close* to accurate, and they would proffer a more

realistic number in approximately 55-60 million total abortions actually performed within the United States since the 1973 decision in *Roe*. This Relator would have to agree, due primarily to the fact that, ever since the mid-to-late 1990s, when chemicals, drugs and other “medicines” began figuring much more heavily into the overall equation, especially discussing the fatal development and unleashing of “morning after pills”, or “emergency contraception pills” (ECPs), the number of “under the radar” abortions not counted each year, vis-à-vis newly-impregnated mothers-to-be ingesting these toxic substances, these “medicines” which are *actually abortifacient pills*..., has been on the dramatic rise, and so more and more through the years, all while the abortion industry would try to have you believe that the number of annual abortions is “declining” (yet another **big fat lie** by this nefarious crowd..), the number of overall abortions – all told – is *actually still increasing*.

75. Indeed, the true number might well be 65 million or more U.S. abortions by now, all since and including the calendar year of 1973. Regardless, we will continue to use the three (3) different numbers of 50 million, 55 million, and 60 million, for our comparison.

76. In attempting to be very overwhelmingly generous, such as is the abundant and exceeding generosity of Almighty God, who gives the opportunity for grace within every circumstance and situation..., we could determine our American unit cost of abortion by suddenly slashing off NEARLY A FULL HALF of the *actual*, truer \$25 trillion total in losses suffered, and merely talk about using this lawsuit’s formal amount of \$15 trillion.

77. Accordingly, that would already indicate unit costs of abortion in America over the years at staggering amounts of \$300,000 per abortion (using 50M), or \$272,727 per abortion (@ 55M), or \$250,000 per abortion (@ 60M) – **all** of which *should* shock you.

78. Yet, again, we know that the truer total is actually \$25 trillion, or even slightly more (and again, that's *only* the economic damages felt within our base M1 money). At *that* level, 60 million abortions equates to \$416,667 in per-unit cost, 55 million abortions comes out to \$454,545 for the unit cost of each, and 50 million abortions figures into that amount of money for a whopping **\$500,000 unit cost** America has suffered **for each and every single abortion** performed in this country since the infamous Roe v. Wade case...

79. Indeed, if we were to include all of the parallel economic damages into the more “speculative” American money, i.e., now talking about well over \$100 trillion of damage suffered, even *hundreds* of trillions, within our M2 and M3 tiers (i.e., mortgage-backed securities, derivatives, pensions, Social Security, entitlement programs, and etc.), *then* we would be lamenting **every** single abortion as a MULTI-MILLION DOLLAR MISTAKE.

80. So then also, we now begin to truly understand just how deeply liable that every person, who has ever been in executive control over any private or public abortion operations, with the same executive power to stop such abortion-economic hemorrhaging, but failed, ignored and/or otherwise neglected to do so, is financially responsible herein.

81. For examples, and (generously) using ONLY the LOWEST amount in unit cost as determined above, i.e., \$250k per each and every abortion committed within the realm or jurisdiction of that person's control, that would indicate Barack Obama's civil liability for 5 million abortions perpetrated under his executive watch coming to \$1.25 trillion, while Mitt Romney's 100,000 abortions during his 4-year Governorship would mean he now owes \$25 billion in reparations, Governor Brian Sandoval (R-NV), who has only been in office since January of 2011, and therefore is responsible as the State's executive

during only sixteen (16) months of abortion, or roughly only about (1.33 years X 12k-14k abortions/year in Nevada => 16k to 18.6k abortions during his tenure, owes \$4 billion to \$4.6 billion in civil damages, new Governor Mark Dayton (D-MN), who entered office at the same time as Gov. Sandoval, with Minnesota having very close abortion numbers to what Nevada suffers, now owes almost dead-nuts to the same amount (\$4+ billion), the lengthy Mayor of New York City, Michael Bloomberg, appears to be proximately liable for an ongoing, “chilling” 40% abortion rate⁷⁷ (**twice** the national rate (*id.*)) happening under his executive watch of over ten (10) years now, so that’s 900,000 abortions (*id.*) for his putative liability in a whopping \$225 billion..., and so forth and so on, proportionally, for every state governor, for every county executive and/or board of commissioners, for every city mayor and/or council, and etc. Yet, for all those *currently-sitting* executives of the public trust, high and low, who merely inherited their share of this [abortion/state-sponsored contraception/state-sponsored sterilization/enacted gay marriage laws/enacted civil union laws/enacted “domestic partner registry” laws/anything similar] mess, and did nothing of their own to affirmatively promote or otherwise support such agendas, then likewise there should be no reason that all such “innocently-caught-up” executives may not promptly now reaffirm, publicly, their defense and support for the obvious economic best interest of all America, reassure their respective constituencies of worthy leadership trust, and so forth and so on, by now **immediately issuing** each their own emergency declarations of prohibition, emergency moratoriums, or such similar enactments, against *at least* abortion-on-demand, if not also these other sinister, nefarious economic disasters.

⁷⁷ 01-06-2011, <http://www.nytimes.com/2011/01/07/nyregion/07abortion.html>

82. In summary of the above, Relator repeats that he seeks not even one single penny from any formally-named Defendant, from any putative Class Defendant (of any of the putative sub-classes), nor from any Fortune 2000 company, or anyone or anything else, whatsoever, but Relator's financial reward herein will be solely from false claims, i.e., the "whistleblower" cut that he is entitled to by federal statute in such false claim matters.

83. All other aforementioned financial scenarios are strictly between the combined American government parties herein, versus all of the Defendants, all the putative Class Defendants, including each and every sub-class that the combined American government parties finally desire to include, and any other individual, entity, instrument or whatever.

84. The question is still, for the American governments and this Court to decide: Just how much money in total judgment for the government Plaintiffs will satisfy the citizens? Should percentage-of-net-worth tiers be utilized between different "levels" of Defendants and Class Defendants? Should there be judgments based upon the number of abortions caused by a person, entity or instrument, multiplied by an abortion "unit cost" figure? And finally, should certain sub-classes of Defendants be able to mitigate liability by acts?

85. *Fortunately*, this case was gifted to be filed in Tampa, within a heavily-populated and "swing vote" region of the Great State of Florida, *itself* also further as a prominent "swing vote" State within the Great Union of States, therefore truly providing a healthy breadth and width of both popular and professional wisdoms, knowledge, suggestion, discussion and debate upon the matters herein, for the sheer amount and number in the variously required, ultimate types of relief to be adjudged does *surely* invite and welcome input from the *broadest possible spectrum* of thought, innovation, leadership and history.

JURISDICTION AND VENUE

86. Jurisdiction could be claimed under a *wide* variety of federal statutory authority, and Relator reserves the right to amend for any dispute of jurisdiction, but for the purpose of simplicity, jurisdiction is proper in this Court under 18 USC § 1964 (Count I), under 31 USC § 3732 (Count II), and directly via the original Founding Documents (Count III), although the matters of Count III (breach of contract by the Federal Government) do 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 fine Court.

87. Venue is proper within this Court pursuant to 18 USC § 1965 (Count I), pursuant to 31 USC § 3732 (Count II), and for the purposes of Count III, this Court is equally as suitable as any other U.S. District Court, and simply provides the most well established type of venue and forum for the parliamentary procedure in discussion needed by all the Plaintiff States and Commonwealths with the Cross-Defendant, the Federal Government.

88. Although typical procedure for any *qui tam* action under 31 USC § 3730 is to seal the proceedings for a sixty (60) time period, this case is not filed under seal, and, in fact, it would necessarily be most *improper* to file this case under seal, for various reasons, including that sealing would create an unfair compensation claims process, in that local governments would still not even be parties, and therefore without an equitably-superior right to certain relief that is otherwise well established and promoted in this open method. Further, and because the matters herein literally affect every single man, woman, and child across the entire planet, through the economic fundamentals of most every single nation around the entire globe as intertwined with our U.S. Dollar as the world reserve

currency, this case must also obviously be conducted in totally-open transparency, lest someone(s) or something(s) cry foul if sealed for an initial time period in biased favor of only certain parties. We, that is, the Plaintiffs, the People, the Banks, the Realtors, the Local Governments and Businesses everywhere, simply cannot financially afford to wait the normal time periods specified under *qui tam* sealing of records – indeed, within less than just one (1) week from filing this case, the massive, continuing total, nationwide loss of actual, measurable American wealth, i.e., the wildly-growing National Debt, caused primarily by decades of Defendants’ abortionist agenda, will swallow up the *entire* recent \$26 Billion USD “historical” judgment of the DOJ against a handful of the biggest banks who settled in regards to mortgage industry issues involved with the 2008 crash. Further, the United States is *already* a guaranteed and named party in this case, *no matter what*, and indeed, even as co-Plaintiff *and* Cross-Defendant – on both sides of the litigation – and, therefore, there is absolutely **no** question that the U.S. Attorney will soon be entering his Appearance into this very case, regardless. Moreover, Count III involves multiple constitutional issues requiring the election process for President and Vice-President be stayed, vacated, annulled and/or otherwise postponed and repaired, a clear *urgency* for the immediate satisfaction of millions of citizen voters, all the political parties, and just about everyone else that is alive and residing within America. Additionally, the facts and issues of abortion and similar birth loss rates are not anything new to anyone, and neither is financial mathematics, hence this lawsuit’s action on Defendants’ false claims neither brings nor raises any substantially-new material or issues, to anyone, anywhere, let alone to the knowledge of the United States or unto its Attorney General, hence avoiding seal.

FACTS REGARDING COUNT I AND COUNT II BELOW

89. All paragraphs 1-88, *supra*, are now incorporated by reference the same as if they had been fully set forth herein (H.I.).

90. 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.

91. 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.

92. 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.

93. 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.

94. Not one single program of K-12 public education material, ever, within the United States’ public school systems, has ever instructed abortion or sterilization of humans as being any right, proper, reasonable, and desirable action by one human upon another.

95. 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.

96. 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.

COUNT I: RACKETEERING (RICO)

97. All paragraphs 1-96, *supra*, are now incorporated by reference the same as if they had been fully set forth herein (H.I.). *See*, especially, ¶¶ 35-39, at pages 18-19, *supra*.

98. 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.

99. 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.

100. 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.

COUNT II: FALSE CLAIMS

101. All paragraphs 1-100, *supra*, are now incorporated by reference the same as if they had been fully set forth herein (H.I.).

102. As often demonstrated throughout herein, to actually fund, using *either* public *or* private monies, our own nation's inevitable economic doom, via 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*.

103. 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.

104. 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.

105. 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 or on behalf of another, for any and all abortion, contraception, sterilization services is, again, automatically *false*, i.e., “false claims” directly within 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), with Relator then 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, at minimum, 15% of the total amount in question, and, over the past six (6) years **in just abortion services only**, that sub-total amount is already estimated at roughly \$3 billion (\$500-600m/year), already appearing to grant Relator an unquestionable minimum of at least \$450 million in said whistleblower award, and *still* not counting monies for contraception or sterilization.

106. 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.

107. 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.

FACTS REGARDING COUNT III BELOW

108. All paragraphs 1-107, *supra*, are now incorporated by reference the same as if they had been fully set forth herein (H.I.).

109. This one CROSS-COUNT against Cross-Defendant, the United States a.k.a. the United States Federal Government, regards various gross breaches of that fundamental American contract formed by the total aggregate of this nation's Founding Documents.

110. More fully explained, that all-important, binding contract is the contract formed by our triplet of Founding Documents, i.e., the Declaration of Independence, the Articles of Confederation, later as 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; From the Declaration of Independence, up to and including the Tenth Amendment, all of these original Founding Documents, together, comprise the most important contract in America – ever – created in mutual legal agreement by the citizen People, by and through their respective States.

111. 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.

112. 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, hence terminating the contract, for all practical effects. 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 contract 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, they *also* have the power to dictate new terms, and/or hire and fire at will, *without* terminating.

113. 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, as variously enumerated within our Founding Documents.

114. Accordingly, due to so many gross forms in numerous breaches of the contract, those superior “parent” parties to the contract formed by our Founding Documents, the States and People, do have every absolute legal right to now also declare the Federal Government in breach of contract, and so dictate new terms, hire and fire at will, and/or any other manner of thing asked to fully repair and satisfy, **in lieu of** full termination.

115. Proffered new performance and consideration terms, required for the currently sitting officials, staff and employees of the Federal Government to now repair, satisfy,

and adequately remedy the various breaches sustained, will include, at a *minimum*, as a starting point *only*, and are certainly *not* limited to, the one handful or so in primary relief demands made via and through this formal notice and lawsuit over same said matters.

116. However, of course, “We The People” cannot logistically self-poll themselves as to any mathematical certainty, rather instantly upon any given subject, whatsoever. This is the primary reason for our various governments to exist, in the first place – to respond in confident manner to large subjects that affect everyone, by organized representation; Therefore, and as practically-speaking, to *actually* declare the Federal Government in breach of contract requires *the States* to vote amongst themselves to determine that fate.

117. A simple majority of States (26 of 50) does not suffice for a reasonable majority of considered opinion, while asking for a super-majority of 2/3rds (34 States) is too much in time of obvious and plain urgency. Splitting the difference into a reasonable majority of 3/5ths of all the 50 States and Commonwealths provides us a well sufficient balance; Therefore, should the current Governors of any thirty (30) or more of the respective sister States and Commonwealths now vote, i.e., decide to then publicly declare their individual determinations in gross breach of contract by the Federal Government, then said breach would become official in all respects, a binding decision by the originating parties, and fully beyond this Court’s reach, since this Court is but a sub-child of the offending party, the Federal Government, itself only the inferior, child party to that all-important contract.

118. Of course, since all of the fifty (50) States and Commonwealths are also direct co-Plaintiffs herein, each of their Attorneys General could simply file that State’s vote

into this case, or, officially meet to vote, since *all* are Members of the National Governors Association, or, just let the media tally up the Governors' votes upon all the airwaves.

119. Incidentally, the leadership hierarchy division within the National Governors Association favorably mirrors the existing basic structure of the Federal Government, hence providing a natural, built-in, sync'd up, fully-working platform, to temporarily transfer all powers and resources of the Federal Government, without hardly skipping a proverbial heartbeat in maintaining full continuity, should there ever be any need to, such as if, say, the States eventually did vote to declare gross breach of contract, or, say, an unconstitutional regime with a faux President was revealed right within our White House Administration and yet Congress was unwilling to do anything about it, or, God *forbid*, some act of terrorism or natural disaster suddenly devastated Washington, DC along with numerous officials of all the Federal Government's branches, departments and divisions, or, anything else similar; Further, practically speaking, in any event when the Federal Government is even temporarily shut down, say for either legal or financial reasons, the situation could be managed reasonably in the following manner: (a) all federal Executive and Legislative powers and authority would be temporarily vested with the combined voices of the several States through their existing and duly-elected leadership hierarchy of the said National Governors Association; (b) all federal financial accounts, physical buildings, assets, goods and supplies, equipment and everything else tangible would temporarily also be vested under the control of the National Governors Association; (c) the federal courts, as only about 1 percent of the total federal budget, would continue a normal function, and be paid by the National Governors Association; (d) the federal

military forces would each simply continue their current deployments unless and until further notice by the NGA acting as the federal Executive, and be paid the same as done for the federal courts; (e) the federal intelligence agencies would continue and also be subject to the NGA, the same as the federal courts and military; (f) likewise, all the various federal entitlement programs would continue subject to the NGA's direction; (g) meanwhile, the NGA would also declare cuts, terminations, and all other repairs and modifications deemed necessary for a repaired Federal Government to resume new operations upon a specified date in future; (h) but obviously, with **new** federal leaders.

120. However, and still correctly pursuant to Contract Law, the offending party, in this case the Federal Government, should be given a brief period of time to resolve the situation to a satisfactory level of performance for consideration. Of all three Branches, the Congress is the highest and most important, earning for itself Article No. 1 of the U.S. Constitution (even the president only gets the *second* place, Article No. 2), and also as having even more “checks and balances” powers over the other two Branches than the other two combined either have over each other, or have in the reverse over Congress.

121. Accordingly, before the several sister States and Commonwealths would actually initiate, or at least before they would complete, a 3/5ths majority vote to officially declare a binding gross breach of contract, the Congress should be given a number of XX days in which to satisfactorily resolve the matters. In Contract Law, the typical period of time might often be only 15, 30, 45, or 60 days, but it is suggested that Congress be allowed the maximum number that those two digits can represent, or a full ninety-nine (99) days in which to effect reasonable and necessary repairs to said original, *still-binding* contract.

122. Accordingly, upon the information above duly provided to all sister State and Commonwealth Plaintiffs herein, they may now choose in deliberation upon said matters.

COUNT III: BREACH OF CONTRACT

123. All paragraphs 1-122, *supra*, are now incorporated by reference the same as if they had been fully set forth herein (H.I.).

124. 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.

ADDITIONAL RELEVANT INFORMATION

125. There exists danger of far too many other potential lawsuits on these same exact subject matters, by banks, businesses of every sort, citizens, and so forth, as well as by the several sister States and Commonwealths, if this case is not resolved to completion.

126. Defendants or others may mistakenly try to proffer concerns that stopping the hemorrhaging of our birth rate, and even similarly around the world, will then lead to “overpopulation” as regards food supplies worldwide and etc., but these worries are all a myth, simple to dispel, because the United Nations – at least twice now – has studied and

reported that Africa alone, as developed in further agriculture, is easily capable of feeding over double the entire world's current population, and that's just counting Africa, all by itself, with neither America, Russia or any other nation around the globe producing even one single ear of corn. Entrepreneurs and industrialized nations can develop commercial-sized farms in various African nations, for efficiency of scale facilitates standardization, management, lowering of overall costs, overall-increased speed of production, harvest and delivery to market, reduction in present worldwide food prices, more variety of foods to choose from, and so forth, and while then also, local citizens, tribes and villages across much of the African continent, engaged into this same agricultural process, can soon earn (better) steady wage incomes, and thereby dramatically increase their own standards of living, virtually eradicate local starvation and hunger, reducing the existing pressures, conflicts and tensions between various African regions, and so everyone – around the entire globe, Africans and all other people everywhere – end up with a double victory.

127. The doctrine of *ex post facto* limitation is only in regards to criminal matters, not in regards to civil matters, therefore civil damages are perfectly acceptable and lawful in all the instant circumstances; Even revoking citizenship and deporting are civil matters.

SUMMARY

128. Numerous of the Defendants and putative Class Defendants are in violations of various federal racketeering laws, having committed multiple acts against trigger statutes.

129. All taxes spent on abortion, and state-sponsored contraception and sterilization services, by fundamentally destroying our nation's economy, are *necessarily* false claims.

130. The Federal Government is *well past* breaches of the original Founding contract.

RELIEF DEMANDED FOR COUNTS I AND II

131. For Counts I and II, Relator demands and prays for the following relief items:

132. 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” to that standard for either exclusivity or inclusivity by the sister States and Commonwealths, in their own sovereign applications regarding that standard.

133. Immediate dissolving of the federal Office of Population Affairs and terminating the services of HHS Secretary Sebelius, her appointee, Marilyn J. Keefe, and also Susan Moskosky, further revoking and removing all forms of present and future federal benefit.

134. Criminal investigation, with actual diligent prosecution, of SKDKnickerbocker, its primary officers including no less than Anita Dunn, and Sandra Fluke, for criminally conspiring in an artifice and/or scheme to willfully and knowingly defraud our Congress.

135. Immediately terminating the services of the one (1) handful of federal Members of Congress who have already openly “come out of the closet” and declared being gay, and allowing their respective States, per a pre-17th Amendment process, to replace them.

136. An injunctive declaration by this Court, permanently enjoining any continued Membership in our federal Congress by such Member caught within **any** sexual scandal that surfaces to mainstream media, thereby also fundamentally embarrassing our nation.

137. An injunctive declaration by this Court, permanently enjoining the usage of any tax dollars, nor any services or representatives of federal, state or local governments, to either support, condone, or otherwise assist the LGBT community, in any shape or form.

138. Any issuance by this Court that at least substantially opens up a governmental dialogue with respect to “fining” Fortune 2000 companies for their official supporting of the birth-rate-killing issues herein. *See*, especially, ¶¶ 51-71, at pages 48-61, *supra*.

139. For the whistleblower portion against false claims, an award pursuant to law paid by the Federal Government unto the Relator, i.e., an amount of some \$450 million, at least, but provided, however, that Relator is willing to sacrifice everything down to a single year’s worth of false claims, and paid unto him at the statutory minimum rate of 15% of such current annual total, i.e., an amount of only some \$90 million or better, and voluntarily dismiss all other claims available under Count I to the Government’s choice in continuing any said matters, upon an extremely generous set of terms to be submitted through formal professional counsel within a matter of days from the date of this filing.

RELIEF DEMANDED FOR COUNT III

140. For Count III, 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.

141. Accordingly, Relator suggests and recommends the following, at a minimum:

Priority Structural Repairs

142. The United States will comply with all necessity of acts in Counts I and II above.

143. 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 contemporaneously-filed pair of documents entitled, Parallel Petition to Strike Down the Twelfth Amendment, and also, Emergency Petition to Enjoin All Pending U.S. Election Processes for the Offices of President and Vice-President.

Economic Relief Packages

144. Since fiat currency is inherently doomed, promptly re-install a modernized “gold standard” in two phases, using 7 precious metals, and then adding 5 rare earth metals, as detailed in the contemporaneously-filed Declaration on Proposed New Gold Standard.

145. Declare the eventual \$300+ billion/year “ObamaCare” package as procedurally and totally void for at least four (4) constitutional reasons, any one (1) of which will end it completely, as detailed within the contemporaneously-filed Parallel Petition to Vacate ObamaCare as Procedurally Void.

146. 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, as is further detailed within the contemporaneously-filed Declaration on Proposed “America Works” Program.

147. And, harvest big data cleanups within all welfare systems, using \$500 IRS rebate checks as incentives for taxpayers, all as further detailed within the contemporaneously-filed Declaration on Proposed “Harvest Time” Program.

CONCLUSION

148. Our nation, America, has been steadily crumbling in variety of structural and economic problems – problems that are so deep as to demand immediate repair attention.

149. This lawsuit package sues directly, via racketeering and false claims procedures, the issues of economically defrauding our nation for decades now with fundamentally-mistaken reductions in birth rates, population growth, consumerism base and so forth, providing various substantial and recommended proposals to get America back on course.

150. Lastly, the Federal Government is way beyond and outside the terms and duties of the original, still-binding contract formed by our States and Commonwealths through our Founding Documents, and if Congress does not satisfactorily repair and ameliorate the injuries and damages sustained upon that contract, within appropriate and urgent time period, the States and Commonwealths may now actually choose to declare default and breach of said contract, and thereafter making any and all necessary repairs, themselves.

151. This Court, which should also be declared as a three-judge panel, due to all of the issues of supreme national importance, has full jurisdiction and authority over Count I and Count II, while this Court has no authority to compel the States and Commonwealths over their any decision(s) in regards to declaring, or not, various breaches of contract by the Federal Government, but this Court provides the best natural debate forum therein, a well-established forum, with well-established rules and other parliamentary procedures.

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

Respectfully submitted,

/s/ Torm Howse

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VERIFICATION

I hereby declare, verify, certify and state, pursuant to the penalties of perjury under the laws of the United States, and particularly by the provisions of 28 USC § 1746, that all of the above and foregoing representations are true and correct to the best of my knowledge, information, and belief.

Executed at _____ Spring_Hill _____, Florida, this __5th__ day of November, 2012.

/s/ Torm Howse

Torm Howse