Leonard G. Horowitz
DrLenHorowitz.com
Editor@MedicalVeritas.org
Editor-in-Chief, Medical Veritas International, Inc.
5348 Vegas Drive, Suite 353
Las Vegas, NV 89108
Telephone: 310-877-3002

Jayanta "Jay" Bhattacharya, M.D., Ph.D.
National Institutes of Health (NIH)
c/o HHS Office of the General Counsel:
Office of the General Counsel
U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

LEGAL NOTICE & DEMAND

Robert F. Kennedy, Jr.
Secretary of Health and Human Services
c/o HHS Office of the General Counsel:
Office of the General Counsel
U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

May 15, 2025

Pam Bondi
U.S. Attorney General,
Department of Justice
950 Pennsylvania Avenue, N.W.,
Washington, D.C. 20530-0001

RE: ONGOING COVID-19 LAB VIRUS COVER-UP BY THE FBI, CIA AND MASS MEDIA OF CRIMES AGAINST HUMANITY: CHARLES LIEBER, ROBERT LANGER, RALPH BARIC, ET. AL., AND COMPOUNDING DAMAGE FROM THE "COVID VIRUS AND VACCINE RICO ENTERPRISE"

Dear Dr. Bhattacharya, HHS Secretary Kennedy, and AG Pam Bondi:

Intelligence and evidence provided in this legal Notice demands your urgent investigations and remedial actions to secure public health and justice pursuant to ongoing COVID matters and compounding damages.

This Notice is timely. The facts evidenced herein indicts, inter alia, Harvard University that is currently suing the Trump Administration to sustain federal funding of concealed persons and programs evidenced herein to be complicit in sourcing COVID-19's emergence from known US and Chinese labs that manufactured the "gain-of-function" virus, related mRNA vaccines, and the ongoing coverup of the nano-neuro bioelectronic intoxicants included in the lipid hydrogel delivery component of the vaccines. This intelligence indicts the "Covid Virus and Vaccine RICO Enterprise" (hereafter, "CVVRE") recklessly neglected, obfuscated and/or harbored by the FBI, CIA, complicit media, and intertwined public and private persons undermining your administrations.

These threats against *We The People* and civilization, especially from secreted lab virus research and developments exposed below, remain unaffected by the White House's May 5, 2025, Executive Order ("EO") touted to improve "Safety and Security of Biological Research" exclusively "in countries of concern like China and Iran . . ." By that EO, your agencies are among those allegedly empowered "to identify and end Federal funding of other biological research that could pose a threat to American public health, public safety, or national security."

In this context, I—a Harvard-trained expert in public health and emerging lab viruses—serve you with this Notice of criminal wrongdoing violating the published positive intent of your agencies and the president's EO. This Notice also issues a Demand upon you for protective and remedial actions.

My name is Dr. Leonard G. Horowitz, DMD. MA. MPH, DNM (hon.). I am among the most heavily censored and disparaged health experts in the world. I currently serve as the Editor-in-Chief of Medical Veritas International Inc.—a 501(c)3 non-profit health educational publisher (MedicalVeritas.org). I have published numerous peer-reviewed science articles, award-winning films and books including the best-selling longest-enduring textbook in the field of laboratory engineered viruses titled *Emerging Viruses: AIDS & Ebola—Nature, Accident or Intentional?* (Amazon/Kindle) The Foreword to my book was contributed by fellow lab virus whistleblower and vaccine toxicity expert, W. John Martin, MD, PhD., previously director of the Bureau of Biologics—forerunner to the FDA—and current Director of the Center for Complex Infectious Diseases ("CCID").

Considering the evidence and intelligence provided below, I request your criminal referrals, investigations, and subpoenas leading to indictments and prosecutions. I also Demand your written response to this Notice, including express response to the evidence provided, within thirty (30) days. This should include commentary pursuant to the exhibited evidence and analysis exposing little-known facts risking public health and U.S. National Security.

A. The FBI's false and misleading Affidavit of Indictment of Harvard Professor Charles Lieber exposes a Harvard/MIT/DOD/China/UNC/NIH/NIAID/Moderna and EcoHealth RICO Enterprise (hereafter, "CVVRE").

The FBI and complicit agents in the CVVRE have acted criminally and concealed risks to public health, safety, and U.S. National Security mounting from the COVID-19 "gain of function" biological weapon and secreted intelligence regarding the mRNA nano-bioelectronic vaccine delivery device developed by Charles Lieber and his cohorts in alleged crimes.

Exhibit 1 evidences a deadly fraud committed under FBI Director Christopher Wray. Page **11** in this Affidavit of FBI Special Agent Robert Plumb he *indicts* Harvard Chemistry Dept. Chairman Charles Lieber for lying about his DOD contracts and Chinese military espionage activities pursuant to conveying electric automobile battery technology to CCP officials through biochemistry students at Harvard. According to the FBI's Press Release (Jan. 28, 2020), "Dr. Lieber . . . served as the Principal Investigator of the Lieber Research Group at Harvard University, which specialized in the area of nanoscience." He "received more than $15,000,000 in grant funding from the National Institutes of Health (NIH) and Department of Defense (DOD)."

To what end? Lieber was convicted at taxpayer expense to serve only two (2) days in jail while supposedly dying of leukemia. Years later, the suspect surprisingly resurfaced to serve China and the PLA as the world's leading nanobioelectronic technology scientist shunned in America.

According to the FBI's Affidavit (**Exhibit 1**), Lieber signed an agreement titled "Academic Cooperative Agreement between Harvard University, USA and Wuhan University of Technology, P.R. China." The stated purpose of the agreement was to "carry out advanced research and development of nanowire-based lithium ion batteries with ***high performance for electric vehicles***."

20. After signing the Thousand Talents Agreement, LIEBER returned to WUT in November 2012. LIEBER's travel expenses to and from Wuhan were paid by WUT. Prior to this trip, arrangements were made to pay LIEBER his salary and living expenses as specified in the Thousand Talents Agreement. For example, in an email dated on or about October 26, 2012, a WUT employee (hereafter the "WUT Employee") wrote to LIEBER:

> Before your visit, I would like to talk about one detail in the implementation of the contract of "one thousand talent" high level foreign expert between you and our university. According to the article concerning the payment and living conditions, I want to know the way you prefer to be paid so that everything can be prepared before your coming. I would like to provide two options for you to choose if you do not mind. Option one. I help you open a new bank account in the Chinese Bank named [redacted]. The payment will be put into your account and you can get the payment from the branch of [redacted] in your country. Option Two. I can prepare the payment in cash.

21. Less than three months later, on or about January 10, 2013, the WUT Professor emailed LIEBER an agreement titled "Academic Cooperative Agreement between Harvard University, USA and Wuhan University of Technology, P.R. China." The stated purpose of the agreement, which had a five-year effective term, was to "carry out advanced research and development of nanowire-based lithium ion batteries with high performance for electric vehicles." Apart from its stated objective, the agreement provided for a "cooperative research program" whereby researchers from WUT would "visit Department of Chemistry and Chemical Biology of

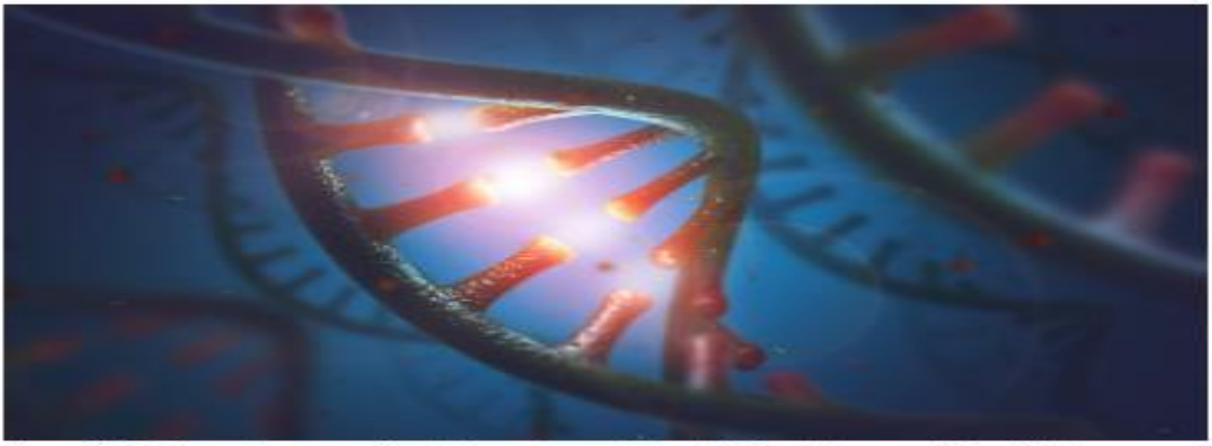
11

Exhibit 1

The "electric vehicles," however, were actually experimental animals and humans whose bioelectronics were mined and leveraged by Lieber and his co-developers' *graphene*-laced lipid hydrogels enabling mRNA vaccine "payload" delivery, including the "gain-of-function" *spike protein* biotechnology developed by Ralph Baric at the UNC, EcoHealth officials, and Wuhan lab operators. **Exhibit 2** evidences this CVVRE advancement of Lieber's graphene hydrogel research and developments conveyed to China, Moderna and BioNTech/Pfizer expressly violating the protective intent of President Trump's May 5, 2025 Executive Order ("EO") and widely heralded "Project Stargate."

Graphene Hydrogel Could Help mRNA Vaccine Target Cancer More Effectively

Helen Albert – February 17, 2021



A specialized graphene oxide hydrogel can help stabilize therapeutic mRNA cancer vaccines and release them slowly into the target tissue, show early results from the National Center for Nanoscience and Technology in Beijing.

mRNA vaccines have attracted a lot of attention in recent months due to the approval of the COVID-19 mRNA vaccines developed by BioNTech/Pfizer and Moderna. However, before the pandemic both Moderna and BioNTech had a focus on developing cancer vaccines, although none have yet reached the clinic.

Therapeutic mRNA vaccines have a lot of potential to target cancer as they can encode tumor-specific antigens and trigger the release of tumor targeting immune cells by the body. They also have a good safety profile compared with other medications. But there have been problems in the past with stability of the RNA. Getting the RNA into the right tissues can also be a problem.

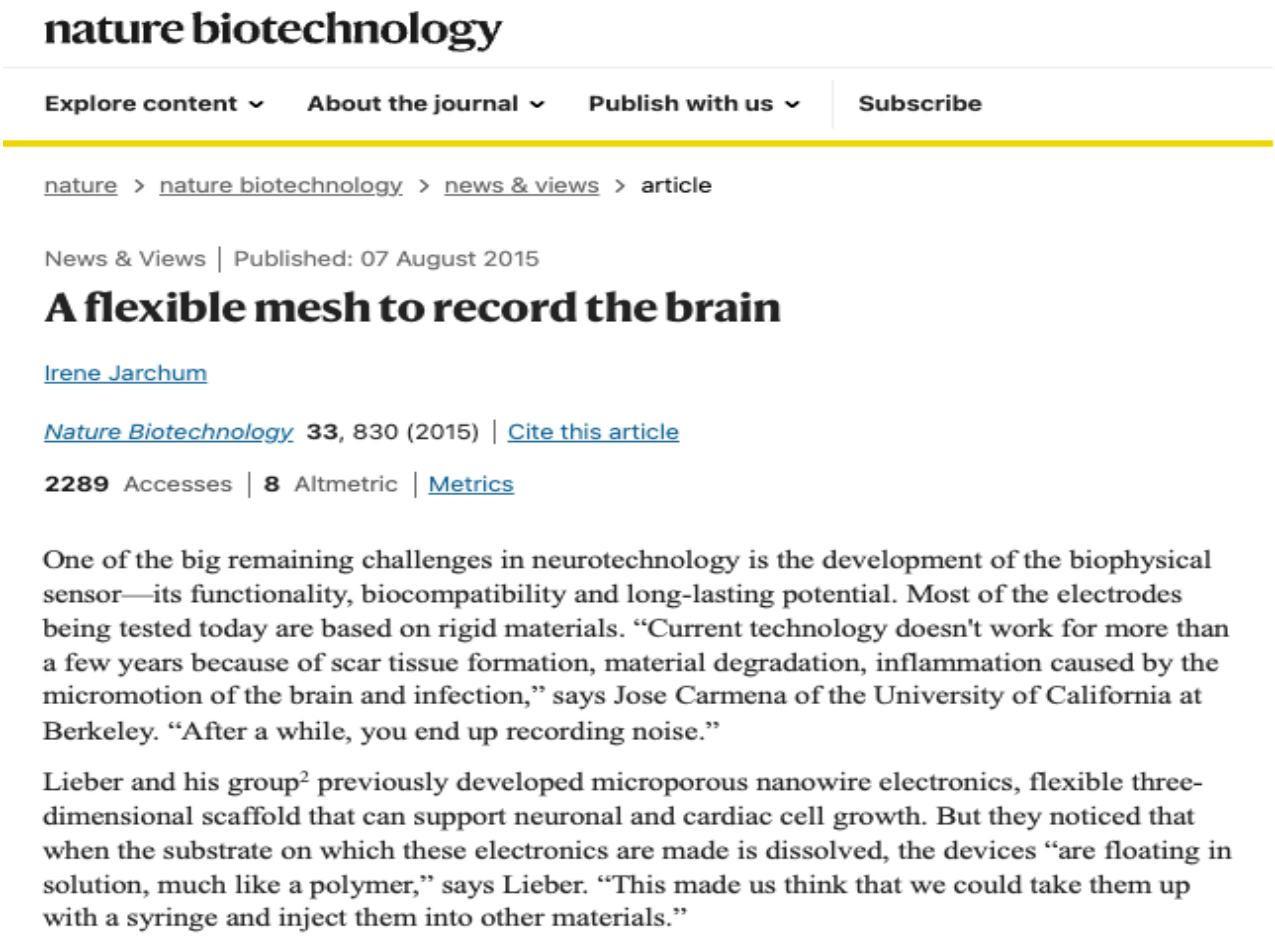
Encapsulation in lipid particles has helped stabilize the COVID-19 mRNA vaccines and other RNA therapies currently on the market. Hai Wang, Ph.D., and colleagues at the National Center for Nanoscience and Technology in Beijing, decided to adapt this idea and test whether a specially designed graphene oxide hydrogel could help stabilize and focus mRNA vaccine treatment for cancer, as well as reducing repeat dosing.

Exhibit 2

Aside from Lieber's extensive financing by public and private entities in China and the U.S., there is no reputable evidence whatsoever; no student or faculty testimony; nor any scientific publications, proving Lieber's lab advanced anything other than nano-bioelectronic devices for use primarily in humans supplementing mRNA vaccine research and developments.

Exhibit 3 additionally evidences Lieber as the main source of this injectable graphene nano-bioelectronic hydrogel technology presumably injected into experimental subjects, including likely

unsuspecting and misinformed DARPA program recipients of the mRNA "novel" vaccines. This presumption is based on facts known and believed by Horowitz and many other experts contemplating Lieber's statement in **Exhibit 3**: "This made us think that we could take them [i.e., these devices] up with a syringe and inject them into other materials" to data-mine "the brain."



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News & Views | Published: 07 August 2015

A flexible mesh to record the brain

Irene Jarchum

Nature Biotechnology **33**, 830 (2015) | Cite this article

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One of the big remaining challenges in neurotechnology is the development of the biophysical sensor—its functionality, biocompatibility and long-lasting potential. Most of the electrodes being tested today are based on rigid materials. "Current technology doesn't work for more than a few years because of scar tissue formation, material degradation, inflammation caused by the micromotion of the brain and infection," says Jose Carmena of the University of California at Berkeley. "After a while, you end up recording noise."

Lieber and his group[2] previously developed microporous nanowire electronics, flexible three-dimensional scaffold that can support neuronal and cardiac cell growth. But they noticed that when the substrate on which these electronics are made is dissolved, the devices "are floating in solution, much like a polymer," says Lieber. "This made us think that we could take them up with a syringe and inject them into other materials."

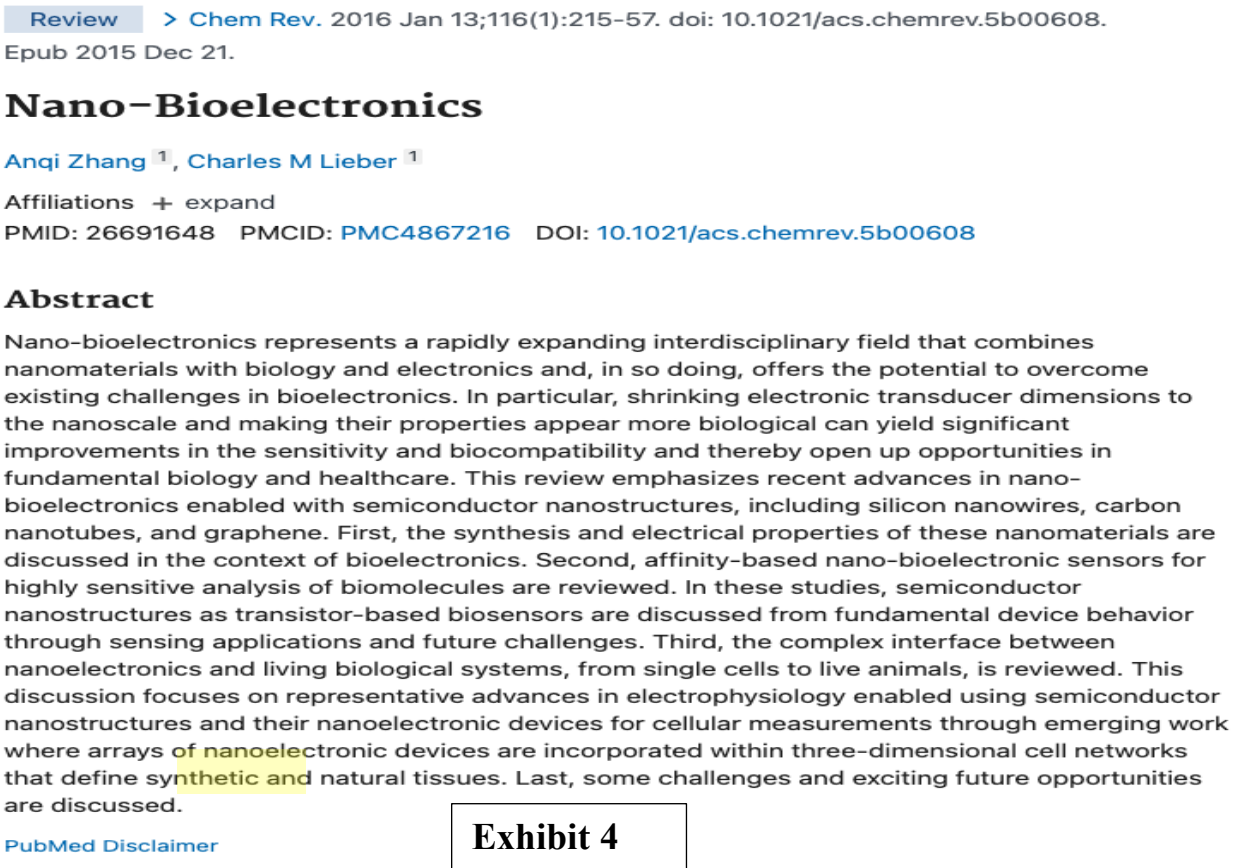
Exhibit 3

The Lieber and Langer labs at Harvard and MIT in alliance with UNC investigators, including James F. Cahoon, co-developed this highly suspect experimental bioelectronic technology featuring graphene as early as 2012. (See **Exhibits 4 and 5** for such proof.)

Given the published peer reviewed science, it is most reasonable to presume the "other materials" Lieber referenced in **Exhibit 3** were selected for brain research and Big Biotech developments, including administering the Lieber et. al., experimental injectable graphene nano-bioelectronic data-mining technology apparently included the Moderna/Pfizer mRNA vaccine hydrogel "payload" delivery apparatus. This best served the vaccines': (1) immuno-stealthing requirement; (2) cell membrane attachment and "payload" delivery capability; (3) the cardiomyocytes and nerve cell attachment objectives reported by Lieber, et. al.; and (4) peer reviewed science detailing the vaccines'

adverse events including myocarditis, pericarditis, blood clots, nerve damage, hearing changes, tinnitus, and many more neurological disorders.[1, 2]

Moreover, this graphene hydrogel bioelectronic delivery device technically justifies officials' denials that the Moderna and Pfizer mRNA vaccines "do not contain graphene." This claim evidences fraud by omission. Much like a syringe delivers a vaccine, but is not part of the vaccine, the Lieber et. al., invention is similarly functioning and separately situated. This nano-neuro lipid hydrogel bioelectronic technology is fundamental to wireless AI-administered "Project Stargate" objectives and the future of cancer immunotherapies, according to the Trump Administration's January 21, 2025 press conference,[3] and leading investors in Big Pharma and BigBiotech.



Review > Chem Rev. 2016 Jan 13;116(1):215-57. doi: 10.1021/acs.chemrev.5b00608. Epub 2015 Dec 21.

Nano-Bioelectronics

Anqi Zhang [1], Charles M Lieber [1]

Affiliations + expand

PMID: 26691648 PMCID: PMC4867216 DOI: 10.1021/acs.chemrev.5b00608

Abstract

Nano-bioelectronics represents a rapidly expanding interdisciplinary field that combines nanomaterials with biology and electronics and, in so doing, offers the potential to overcome existing challenges in bioelectronics. In particular, shrinking electronic transducer dimensions to the nanoscale and making their properties appear more biological can yield significant improvements in the sensitivity and biocompatibility and thereby open up opportunities in fundamental biology and healthcare. This review emphasizes recent advances in nano-bioelectronics enabled with semiconductor nanostructures, including silicon nanowires, carbon nanotubes, and graphene. First, the synthesis and electrical properties of these nanomaterials are discussed in the context of bioelectronics. Second, affinity-based nano-bioelectronic sensors for highly sensitive analysis of biomolecules are reviewed. In these studies, semiconductor nanostructures as transistor-based biosensors are discussed from fundamental device behavior through sensing applications and future challenges. Third, the complex interface between nanoelectronics and living biological systems, from single cells to live animals, is reviewed. This discussion focuses on representative advances in electrophysiology enabled using semiconductor nanostructures and their nanoelectronic devices for cellular measurements through emerging work where arrays of nanoelectronic devices are incorporated within three-dimensional cell networks that define synthetic and natural tissues. Last, some challenges and exciting future opportunities are discussed.

PubMed Disclaimer

Exhibit 4

The above facts and evidence provide substantial cause for the CVVRE to discredit Charles Lieber through the FBI's false and misleading prosecution, and banish him to China whereby subsequent deaths and damages from his inventions may be attributed to Chinese military malfeasance indemnifying American involvements.

---

[1] Yaamika H, Muralidas D, Elumalai K. Review of adverse events associated with COVID-19 vaccines, highlighting their frequencies and reported cases. J Taibah Univ Med Sci. 2023 Sep 5;18(6):1646-1661. doi: 10.1016/j.jtumed.2023.08.004. PMID: 37732332; PMCID: PMC10507236.

[2] Garg RK, Paliwal VK. Spectrum of neurological complications following COVID-19 vaccination. Neurol Sci. 2022 Jan;43(1):3-40. doi: 10.1007/s10072-021-05662-9. Epub 2021 Oct 31. PMID: 34719776; PMCID: PMC8557950.

[3] Pangambam S. Transcript of Trump press conference announcing AI infrastructure project called Stargate. *The Singju Post*. January 22, 2025. Online at: https://singjupost.com/transcript-of-trump-press-conference-announcing-ai-infrastructure-project-called-stargate/

Meanwhile, Harvard's Medical Dean George Daley knowingly facilitated financially, covertly and otherwise, this CVVRE racket with Dr. Fauci, NIH Director Francis Collins, Chinese investors, and military officials as evidenced below. This secret DARPA and private industry program required investments in the Lieber/Langer/Baric affiliated labs to develop more than the mRNA vaccines. The nano-bioelectronic vaccine delivery technology provided the more important "payload" for which the COVID-19 'plandemic' provided 'cover' and commercial justification.

Article | Published: 26 August 2012

Macroporous nanowire nanoelectronic scaffolds for synthetic tissues

Bozhi Tian, Jia Liu, Tal Dvir, Lihua Jin, Jonathan H. Tsui, Quan Qing, Zhigang Suo, Robert Langer, Daniel S. Kohane ✉ & Charles M. Lieber ✉

Nature Materials **11**, 986–994 (2012) | Cite this article

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Abstract

The development of three-dimensional (3D) synthetic biomaterials as structural and bioactive scaffolds is central to fields ranging from cellular biophysics to regenerative medicine. As of yet, these scaffolds cannot electrically probe the physicochemical and biological microenvironments throughout their 3D and macroporous interior, although this capability could have a marked impact in both electronics and biomaterials. Here, we address this challenge using macroporous, flexible and free-standing nanowire nanoelectronic scaffolds (nanoES), and their hybrids with synthetic or natural biomaterials. 3D macroporous nanoES mimic the structure of natural tissue scaffolds, and they were formed by self-organization of coplanar reticular networks with built-in strain and by manipulation of 2D mesh matrices. NanoES exhibited robust electronic properties and have been used alone or combined with other biomaterials as biocompatible extracellular scaffolds for 3D culture of neurons, cardiomyocytes and smooth muscle cells. Furthermore, we show the integrated sensory capability of the nanoES by real-time monitoring of the local electrical activity within 3D nanoES/cardiomyocyte constructs, the response of 3D-nanoES-based neural and cardiac tissue models to drugs, and distinct pH changes inside and outside tubular vascular smooth muscle constructs.

Exhibit 5

While Harvard's Dean Daley accepted millions of dollars in concealed Chinese investments, this "dual purpose" covert deployment of the hydrogel biotechnology caused widespread disease and depopulation. This damage has been compounding as a result of COVID vaccine advertisements and false safety assurances. This damage had been openly sought by Bill Gates and other members of the World Economic Forum ("WEF") for "carbon zero" advocacy according to public knowledge. Such funding to Harvard, MIT, and elsewhere has continued under the guises of public health and "National Security," both overseen by the secretive CIA involving DARPA. The continuance of these covert

programs and neglected/secreted risks are apparently *exempt* from regulatory scrutiny and prohibition by President Trump's Executive Order of May 5, 2025. These matters of depopulation have been brought to the public's attention by WEF insider, Pascal Najadi.

It is now public knowledge that Lieber's multidisciplinary research was financed by the U.S. and Chinese governments, their militaries, and privately by companies including Moderna (i.e., Morgan Holland with J.P. Morgan Wealth Management; JPMorgan Chase & Co., officials Robert Langer, Timothy Alan Springer and Derrick Rossi), Pfizer and BioNTek. The U.S. Military, the NIH and Dr. Fauci's NIAID all fraudulently concealed the aforementioned nano-bioelectronic lipid graphene hydrogel research and development within the Harvard/MIT/DARPA/UNC Enterprise. Instead of protecting public health, safety and National Security, the CVVRE suspects falsely touted the safety and efficacy of the additionally toxic "spike protein" "gain-of-function" antigen in the mRNA vaccines. Officials under the influence of special interests "fast-tracked" the experimental vaccines for the COVID-19 "emergency." This focus on "novel" mRNA vaccines diverted attention away from hydrogel scrutiny. **Exhibit 6** shows one such "Science News" social conditioning propaganda piece evidencing Dr. Baric at the UNC sourcing the COVID-19 lab virus threat before 2016.

Science News *from research organizations*

New SARS-like virus is poised to infect humans

The new virus, known as WIV1-CoV, directly binds to the same human receptor as the SARS strain that infected thousands in 2002

Date: March 14, 2016

Source: University of North Carolina at Chapel Hill

Summary: A SARS-like virus found in Chinese horseshoe bats may be poised to infect humans without the need for adaptation, overcoming an initial barrier that could potentially set the stage for an outbreak according to a new study.

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Mind & Brain
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- Stress

FULL STORY

A SARS-like virus found in Chinese horseshoe bats may be poised to infect humans without the need for adaptation, overcoming an initial barrier that could potentially set the stage for an outbreak according to a study at the University of North Carolina at Chapel Hill.

The work, led by Ralph Baric, Ph.D., professor of epidemiology at UNC's Gillings School of Global Public Health, comes on the heels of two recent high-profile outbreaks -- Ebola and Zika -- for which there are no vaccines. The two outbreaks combined claimed thousands of

Exhibit 7 shows Dr. Barac's U.S. Patent on "METHODS FOR PRODUCING RECOMBINANT CORONAVIRUS" filed in 2004 and issued in 2007 as Patent No. US 7,279,327 B2.

Exhibit 6


US007279327B2

(12) **United States Patent**
Curtis et al.

(10) **Patent No.: US 7,279,327 B2**
(45) **Date of Patent: Oct. 9, 2007**

(54) **METHODS FOR PRODUCING RECOMBINANT CORONAVIRUS**

(75) Inventors: **Kristopher M. Curtis**, Chapel Hill, NC (US); **Boyd Yount**, Hillsborough, NC (US); **Ralph S. Baric**, Haw River, NC (US)

(73) Assignee: **The University of North Carolina at Chapel Hill**, Chapel Hill, NC (US)

(*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 33 days.

(21) Appl. No.: **10/474,962**

(22) PCT Filed: **Apr. 19, 2002**

(86) PCT No.: **PCT/US02/12453**

§ 371 (c)(1),
(2), (4) Date: **May 25, 2004**

(87) PCT Pub. No.: **WO02/086068**

PCT Pub. Date: **Oct. 31, 2002**

(65) **Prior Publication Data**

US 2004/0235132 A1 Nov. 25, 2004

Related U.S. Application Data

(60) Provisional application No. 60/285,320, filed on Apr. 20, 2001, provisional application No. 60/285,318, filed on Apr. 20, 2001.

(51) **Int. Cl.**
C12N 15/85 (2006.01)
C12N 15/63 (2006.01)

(52) **U.S. Cl.** **435/325**; 435/320.1; 424/221.1

(58) **Field of Classification Search** 435/320.1,

Baudoux et al. "Coronavirus Pseudoparticles Formed with Recombinant M and E Proteins Induce Alpha Interferon Synthesis by Leukocytes" *Journal of Virology* 72(11):8636-8643 (1998).

Bos et al. "The Production of Recombinant Infectious DI-Particles of a Murine Coronavirus in the Absence of Helper Virus" *Virology* 218:52-60 (1996).

de Haan et al. "Coronavirus Particle Assembly: Primary Structure Requirements of the Membrane Protein" *Journal of Virology* 72(8):6838-6850 (1998).

Fuerst et al. "Eukaryotic transient-expression system based on recombinant vaccinia virus that synthesizes bacteriophage T7 RNA polymerase" *Proc. Natl. Acad. Sci. USA* 83:8122-8126 (1986).

Vennema et al. "Intracellular Transport of Recombinant Coronavirus Spike Proteins: Implications for Virus Assembly" *Journal of Virology* 64(1):339-346 (1990).

Vennema et al. "Nucleocapsid-independent assembly of coronavirus-like particles by co-expression of viral envelope protein genes" *The EMBO Journal* 15(8):2020-2028 (1996).

Pushko et al. "Replicon-Helper Systems from Attenuated Venezuelan Equine Encephalitis Virus: Expression of Heterologous Genes in Vitro and Immunization against Heterologous Pathogens in Vivo" *Virology* 239:389-401 (1997).

Schutz-Cherry et al. "Influenza (A/HK/156/97) Hemagglutinin Expressed by an Alphavirus Replicon System Protects Chickens against Lethal Infection with Hong Kong-Origin H5N1 Viruses" *Virology* 279:55-59 (2000).

Hevey et al. "Marburg Virus Vaccines Based upon Alphavirus Replicons Protect Guinea Pigs and Nonhuman Primates" 251:28-37 (1998).

Percy et al. "A Poliovirus Replicon Containing the Chloramphenicol Acetyltransferase Gene Can Be Used To Study the Replication and Encapsidation of Poliovirus RNA" *Journal of Virology* 66(8):5040-5046 (1992).

(Continued)

Primary Examiner—Bruce R. Campell
Assistant Examiner—Bao Qun Li
(74) *Attorney, Agent, or Firm*—Myers, Bigel, Sibley & Sajovec, P.A.

(57) **ABSTRACT**

Exhibit 7

In fact, the FBI'a actual Affidavit indicting Lieber, provided by FBI Special Agent Robert Plumb, does not appear to have been signed nor dated, consistent with the falsity of the document and overall COVID cover-up and CVVRE diversionary scheme.

Exhibit 8 identifies Lieber's presumed "Intelligence Community" 'handler,' James F. Cahoon, whose research and developments at UNC and Harvard intimately intertwined with Lieber's most advanced

bioelectonic inventions, such as synthetic tissue fabrication and frequency resonance interventions. These enable photoacoustic and plasmonic data-mining and manipulations of humans cells suitable for "Project Stargate" heralded by President Trump. Cahoon's 2020 publications include: "Remote nongenetic optical modulation of neuronal activity using fuzzy graphene."

Curriculum Vitae

James F. Cahoon, Ph.D.

E-mail: jfcahoon@unc.edu • Telephone: 919-962-3386 • Web: http://cahoon.chem.unc.edu
ORCID: 0000-0003-1780-215X • ResearcherID: L-4884-2018

(a) Address

James F. Cahoon, Ph.D.
Department of Chemistry, CB #3290
University of North Carolina at Chapel Hill
Caudill 019, 131 South Road
Chapel Hill, NC 27599-3290

(b) Education

2003–2008, Ph.D.	Department of Chemistry, University of California, Berkeley (12/20/2008) Research advisor: Prof. Charles B. Harris
1999–2003, B.S.	Summa Cum Laude & Highest Honors, The College of William and Mary Concentrations in Chemistry & Philosophy Research advisor: Prof. Robert A. Orwoll

(c) Professional Experience

2022–Present	Professor, Department of Chemistry, UNC Chapel Hill
2019–Present	Executive Director of Research Core Facilities, College of Arts & Sciences
2018–2019	Executive Director, Chapel Hill Analytical and Nanofabrication Laboratory
2017–2022	Associate Professor, Department of Chemistry, UNC Chapel Hill
2015–Present	UNC Director for the Research Triangle Nanotechnology Network (RTNN), a site in the National Nanotechnology Coordinated Infrastructure
2011–2017	Assistant Professor, Department of Chemistry, UNC Chapel Hill
2009–2011	Intelligence Community Postdoctoral Research Fellow, Department of Chemistry & Chemical Biology, Harvard University, Research advisor: Prof. Charles M. Lieber

Exhibit 8

Cahoon's and Lieber's "Intelligence Community" complicity and administrative oversight was solidly corroborated by Dr. Andrew Huff, the former VP of Data and Technology at EcoHealth Alliance. The name "EcoHealth" is presumed to be a deceptive misnomer given COVID's manmade viral threat to the environment and public health. Huff became a whistleblower confessing the CIA's secret oversight and commercial interest in the CVVRE and pandemic scheme involving In-Q-Tel. Huff published a letter stating that EcoHealth President Dr. Peter Daszak disclosed to him in late 2015 and early 2016 that he was working with the CIA. In fact, consistent with Charles Lieber's and Dean Daley's US/Chinese double agency, at the end of Huff's letter, he posits "*that Dr. Peter Daszak could be a double agent working on behalf of the Chinese government based on his observations of his behavior*

and the nature of statements related to working with the Chinese." Allegedly, Daszak "did not see risks, concerns, or other obvious problems related to conducting gain of function work or other high-risk laboratory work in China." Further, Daszak and EcoHealth concealed records demanded by NIH and Trump Administration officials while coordinating the lab origin cover-up with Dr. Fauci and fellow CVVRE associates.

The aforementioned evidence gives probable cause to indict the named CVVRE officials, especially Charles Lieber, Robert Langer, Moderna and Pfizer officials and DARPA co-investors. Charles Lieber's highly publicized DOJ indictment served no greater purpose than to divert from the lab origin of COVID-19 and alleged 'plandemic' scheme. The focus on Lieber's 'car batteries' concealed the actual crimes, and feigned judicial oversight of the alleged RICO Enterprise. Heavily publicized diversions helped conceal the myopathic and neuropathic graphene hydrogel components, and falsely touted graphene as an immune-boosting "adjuvant" rather than intoxicant damaging nerves and muscles.

B. Concealing COVID-19's Spike Protein "Gain-of-Function" Bioweapon Sourced from the CVVRE's HIV-1/AIDS/SARS Recombinant.

Exhibit 9 evidences the urgent e-mail sent to Dr. Fauci by Harvard Medical School Dean Daley on Sunday, February 2, 2020, cc'ing NIH Director Francis Collins and others regarding "coordination" of the lab virus cover-up. This fraudulent concealment effort began with efforts to neutralize the so-called "Indian Paper" published in good faith by Prashant Pradhan and eight genetic analysts hours earlier. The Indian Paper was published and widely circulated to medical investigators and editors worldwide on Friday night, January 31, 2020. The Indian Paper proved beyond any reasonable doubt COVID-19's spike protein "gain-of-function" antigenic lab development (presumably manufactured initially at Dr. Barac's UNC lab in association with Peter Daszak's CIA/EcoHealth Wuhan operations) sourced from the CVVRE's integration of HIV-1/AIDS genes into the coronavirus SARS recombinant to weaponize the mutagen.

Exhibit 9 also evidences Chinese government agents and Evergrande Company officials, Jack Xia and Jack Liu, conducting business at that time at Harvard. They had to have been reasonably concerned about the fallout from the Indian Paper threatening to expose the Enterprise's COVID pandemic scheme and Chinese investments therein.

The Evergrande Company further ties the Liber and Langer nano-bioelectronic developments at Harvard, MIT and UNC to the FBI's falsified indictment of Lieber, and China's involvement in the overall COVID scheme. The Evergrande Company formed the China Evergrande New Energy Vehicle Group Limited ("CENEVGL") contemporaneously with Lieber's arrest and Indian Paper publication in 2020. The CENEVGL matched the FBI's falsified Affidavit that Lieber's espionage conveyed "nanowire-based lithium ion batteries with high performance for electric vehicles." Again, the actual "electric vehicles" being humans; that is, the Moderna and Pfizer mRNA vaccine recipients intoxicated by the graphene lipid hydrogel delivery device.

From: Fauci, Anthony (NIH/NIAID) [E]
Sent: Sun, 2 Feb 2020 15:44:24 +0000
To: Daley, George Q.
Cc: Collins, Francis (NIH/OD) [E] (b) (6);Marston, Hilary (NIH/NIAID) [E];Graham, Barney (NIH/VRC) [E]
Subject: RE: Inquiry and possible pone call

George:
Thanks for the note. There is a lot of communications between scientists in China and their colleagues in the USA , many with whom they have been collaborating prior to the outbreak. There is no real "coordination" of this response since we do not know who is doing what until we are told – just like you have done here. Dr. Soumya Swaminathan, Chief Scientist at WHO is organizing a meeting on Feb. 11-12 in Geneva to try and develop a research agenda for nCoV. I am sure that Chinese scientists will be there. It might be helpful to contact her. Her e-mail address is (b) (6).
I hope that this is helpful. I will follow-up with a call.
Best,
Tony

From: Daley, George Q. <(b) (6)>
Sent: Sunday, February 2, 2020 10:32 AM
To: Fauci, Anthony (NIH/NIAID) [E] (b) (6); Fauci, Anthony (NIH/NIAID) [E] (b) (6)>
Subject: Inquiry and possible pone call

Dear Tony,

Alan Garber, Harvard's Provost, and I met yesterday with a team led by Jack Xia, the CEO of China's Evergrande Company, and Dr Jack Liu, Evergrande's chief health officer, who stated thy were acting on behalf of Dr Zhong Nanshan, China's key point person on the coronavirus outbreak (see below). (b) (4), and they arranged a conference call for tomorrow morning EST with Dr. Zhong.

While I have been mobilizing efforts of our community to react to the virus and to this request, I am not naïve to the challenging politics of such a relationship. I do not want to complicate or duplicate efforts already underway, and am writing to request

Exhibit 9

Exhibit 9 evidences two most substantive and revealing e-mails identifying key administrators within the CVVRE awaiting orders pursuant to the Indian paper cover-up from the World Health Organization (WHO) through Jeremy "James" Farrar of England's Wellcome Trust. These e-mails evidence foreknowledge of the Enterprise's liability for financing and covertly conducting the dangerous "gain-of-function" research within the Harvard/MIT/UNC/FBI/CIA/DARPA/EcoHealth/ Wuhan Enterprise. These agents and agencies shared complicity in the larger COVID military and commercial agendas pursuant to the allegation of advancing profitable depopulation enriching WEF members and fellow 'Deep State' investment bankers.

In addition, these e-mails, and related chronology of Justice Department activity, evidence mens rea—criminal intent of Dr. Fauci's cohorts in these biocrimes.

It is public knowledge that Robert Langer at MIT officiated (along with Moderna's earliest investors, Timothy Alan Springer and Derrick Rossi, DARPA's financing of Moderna's mRNA nano-bioelectronic program following co-publication with Lieber at Harvard. (See inter alia **Exhibits 5 and 6**, Lieber/Langer co-authored science involving "Intelligence Community" informant James Cahoon.)

Exhibit 10 evidences the Indian Paper publication abstract in which Pradhan et. al., conclude: "The finding of 4 unique inserts in the 2019-nCoV, all of which have identity/similarity to amino acis residues in key structural proteins of HIV-1 is unlikely to be fortuitous in nature."

Uncanny similarity of unique inserts in the 2019-nCoV spike protein to HIV-1 gp120 and Gag

Prashant Pradhan[$1,2], Ashutosh Kumar Pandey[$1], Akhilesh Mishra[$1], Parul Gupta[1], Praveen Kumar Tripathi[1], Manoj Balakrishnan Menon[1], James Gomes[1], Perumal Vivekanandan*[1]and Bishwajit Kundu*[1]

[1]Kusuma School of biological sciences, Indian institute of technology, New Delhi-110016, India.

[2]Acharya Narendra Dev College, University of Delhi, New Delhi-110019, India

[$]Equal contribution

* Corresponding authors- email: bkundu@bioschool.iitd.ac.in

vperumal@bioschool.iitd.ac.in

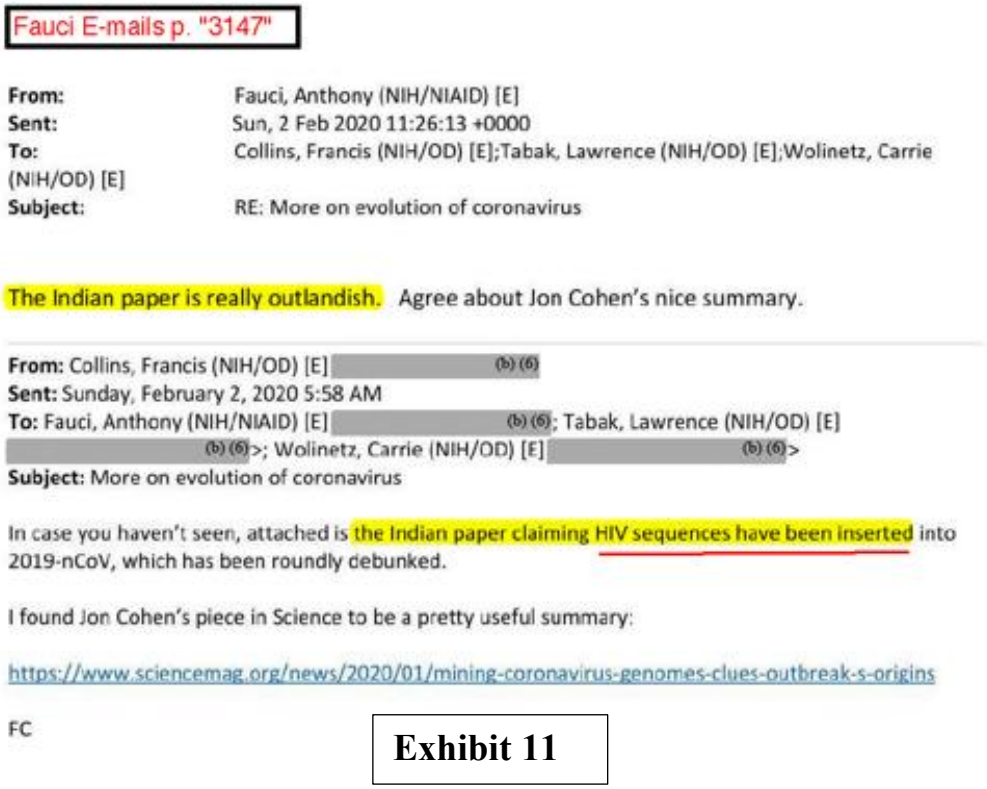
Abstract:

We are currently witnessing a major epidemic caused by the 2019 novel coronavirus (2019-nCoV). The evolution of 2019-nCoV remains elusive. We found 4 insertions in the spike glycoprotein (S) which are unique to the 2019-nCoV and are not present in other coronaviruses. Importantly, amino acid residues in all the 4 inserts have identity or similarity to those in the HIV-1 gp120 or HIV-1 Gag. Interestingly, despite the inserts being discontinuous on the primary amino acid sequence, 3D-modelling of the 2019-nCoV suggests that they converge to constitute the receptor binding site. The finding of 4 unique inserts in the 2019-nCoV, all of which have identity /similarity to amino acid residues in key structural proteins of HIV-1 is unlikely to be fortuitous in nature. This work provides yet unknown insights on 2019-nCoV and sheds light on the evolution and pathogenicity of this virus with important implications for diagnosis of this virus.

Exhibit 10

At the time this was published, Prashant Pradhan, was the Chief Technical Officer for IBM in Asia. Pradhan's team used the WATSON computer and genetic software to analyze similarities in the coronavirus and other pathogens. Their work was meticulous and telling. That's why it caused panic within the CVVRE.

Exhibit 11 evidences Dr. Fauci's disturbance over the Indian Paper, calling it "really outlandish." All weekend long, Enterprise officials urgently corresponded to strategize fraudulent concealments and sham discrediting science publications. The most obvious fraudulent opposition was schemed by Fauci and his close associates, including Kristian Andersen and Robert Garry. They published in March 2020 the false and misleading article in *Nature Medicine* as shown in **Exhibit 12**. This fraudulent report concluded that the CVVRE's lab virus "[wa]s not a laboratory construct or a purposely manipulated virus."



Fauci E-mails p. "3147"

From: Fauci, Anthony (NIH/NIAID) [E]
Sent: Sun, 2 Feb 2020 11:26:13 +0000
To: Collins, Francis (NIH/OD) [E];Tabak, Lawrence (NIH/OD) [E];Wolinetz, Carrie (NIH/OD) [E]
Subject: RE: More on evolution of coronavirus

The Indian paper is really outlandish. Agree about Jon Cohen's nice summary.

From: Collins, Francis (NIH/OD) [E] (b) (6)
Sent: Sunday, February 2, 2020 5:58 AM
To: Fauci, Anthony (NIH/NIAID) [E] (b) (6); Tabak, Lawrence (NIH/OD) [E] (b) (6)>; Wolinetz, Carrie (NIH/OD) [E] (b) (6)>
Subject: More on evolution of coronavirus

In case you haven't seen, attached is the Indian paper claiming HIV sequences have been inserted into 2019-nCoV, which has been roundly debunked.

I found Jon Cohen's piece in Science to be a pretty useful summary:

https://www.sciencemag.org/news/2020/01/mining-coronavirus-genomes-clues-outbreak-s-origins

FC

Exhibit 11

Exhibit 13 evidences otherwise, as well as the complicit agents' mens rea—intentional deception to conceal their crimes. On Saturday, February 1, 2020, six weeks before the sham science report was published by *Springer Nature*, Andersen wrote Fauci, "[W]e have to look really closely at all the sequences to see that some of the features (potentially) look engineered. . . . [we all] find the genome inconsistent with expectations from evolutionary theory."

Further evidencing criminal conspiracy, the Indian Paper was promptly censored under pressures brought to bear against Pradhan, et al. It was also scorned by investigators with obvious conflicting interests. Later, in 2024, the House Select Subcommittee on the Coronavirus Pandemic concluded, contrary to naysayers, and in support of Pradhan et. al.'s conclusions, "COVID-19 most likely emerged from a laboratory in Wuhan, China."

Nevertheless, Congressional investigators recklessly neglected the aforementioned evidence of racketeering in biological and chemical weapons and organized crimes against humanity.

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Correspondence | Published: 17 March 2020

The proximal origin of SARS-CoV-2

Kristian G. Andersen, Andrew Rambaut, W. Ian Lipkin, Edward C. Holmes & Robert F. Garry

Nature Medicine **26**, 450–452 (2020) | Cite this article

6.05m Accesses | **32640** Altmetric | Metrics

To the Editor — Since the first reports of novel pneumonia (COVID-19) in Wuhan, Hubei province, China[1,2], there has been considerable discussion on the origin of the causative virus, SARS-CoV-2[3] (also referred to as HCoV-19)[4]. Infections with SARS-CoV-2 are now widespread, and as of 11 March 2020, 121,564 cases have been confirmed in more than 110 countries, with 4,373 deaths[5].

SARS-CoV-2 is the seventh coronavirus known to infect humans; SARS-CoV, MERS-CoV and SARS-CoV-2 can cause severe disease, whereas HKU1, NL63, OC43 and 229E are associated with mild symptoms[6]. Here we review what can be deduced about the origin of SARS-CoV-2 from comparative analysis of genomic data. We offer a perspective on the notable features of the SARS-CoV-2 genome and discuss scenarios by which they could have arisen. Our analyses clearly show that SARS-CoV-2 is not a laboratory construct or a purposefully manipulated virus.

Exhibit 12

From: Fauci, Anthony (NIH/NIAID) [E]
Sent: Sat, 1 Feb 2020 18:43:31 +0000
To: Kristian G. Andersen
Subject: RE: FW: Science: Mining coronavirus genomes for clues to the outbreak's origins

Thanks, Kristian. Talk soon on the call.

From: Kristian G. Andersen [redacted]>
Sent: Friday, January 31, 2020 10:32 PM
To: Fauci, Anthony (NIH/NIAID) [E] [redacted]
Cc: Jeremy Farrar [redacted]>
Subject: Re: FW: Science: Mining coronavirus genomes for clues to the outbreak's origins

Hi Tony,

Thanks for sharing. Yes, I saw this earlier today and both Eddie and myself are actually quoted in it. It's a great article, but the problem is that our phylogenetic analyses aren't able to answer whether the sequences are unusual at individual residues, except if they are completely off. On a phylogenetic tree the virus looks totally normal and the close clustering with bats suggest that bats serve as the reservoir. The unusual features of the virus make up a really small part of the genome (<0.1%) so one has to look really closely at all the sequences to see that some of the features (potentially) look engineered.

We have a good team lined up to look very critically at this, so we should know much more at the end of the weekend. I should mention that after discussions earlier today, Eddie, Bob, Mike, and myself all find the genome inconsistent with expectations from evolutionary theory. But we have to look at this much more closely and there are still further analyses to be done, so those opinions could still change.

Best,
Kristian

On Fri, Jan 31, 2020 at 18:47 Fauci, Anthony (NIH/NIAID) [E] [redacted]> wrote:

Jeremy/Kristian:
This just came out today. You may have seen it. If not, it is of interest to the current discussion.
Best,
Tony

From: Folkers, Greg (NIH/NIAID) [E] [redacted]
Sent: Friday, January 31, 2020 8:43 PM
Subject: Science: Mining coronavirus genomes for clues to the outbreak's origins

Exhibit 13

C. Concealing COVID Carcinogenesis.

"Silence is often evidence of the most persuasive character," Justice Brandeis admonished the defendant in *United States ex rel. Bilokumsky v. Tod*, 263 U. S. 149, 263 U. S. 153-154 (1923). Aside from the "smoking gun" of HIV-1/AIDS sequences comprising the bulk of the "gain-of-function" spike protein bioweapon discovered by Pradhan et. al., (**Exhibit 10**); and the fraudulent concealments and misrepresentations by Fauci et. al. to conceal the lab origin of the COVID bioweapon; the 'Elephant Under the Carpet' compounding evidence of the COVID-cover-up and murderous crime is the unconscionable "silence," censorship, and reckless neglect of HIV/AIDS lentivirus-like pathogenesis of COVID-19, and the spike protein gain-of-function bioweapon. These lab developments are resulting in COVID lymphatic cancers, "long-COVID" immune suppression, and greater risks to public health from unstable emerging viral recombinants.[4]

These likelihoods are especially disconcerting given emerging evidence suggesting that under certain conditions some single-stranded RNA (ssRNA) viruses, including coronaviruses, might be involved in or associated with processes that resemble HIV/AIDS pathogenesis featuring RNA-dependent DNA polymerase activity, particularly following laboratory mutagenesis. **Figures 14 and 15** graph these risks.

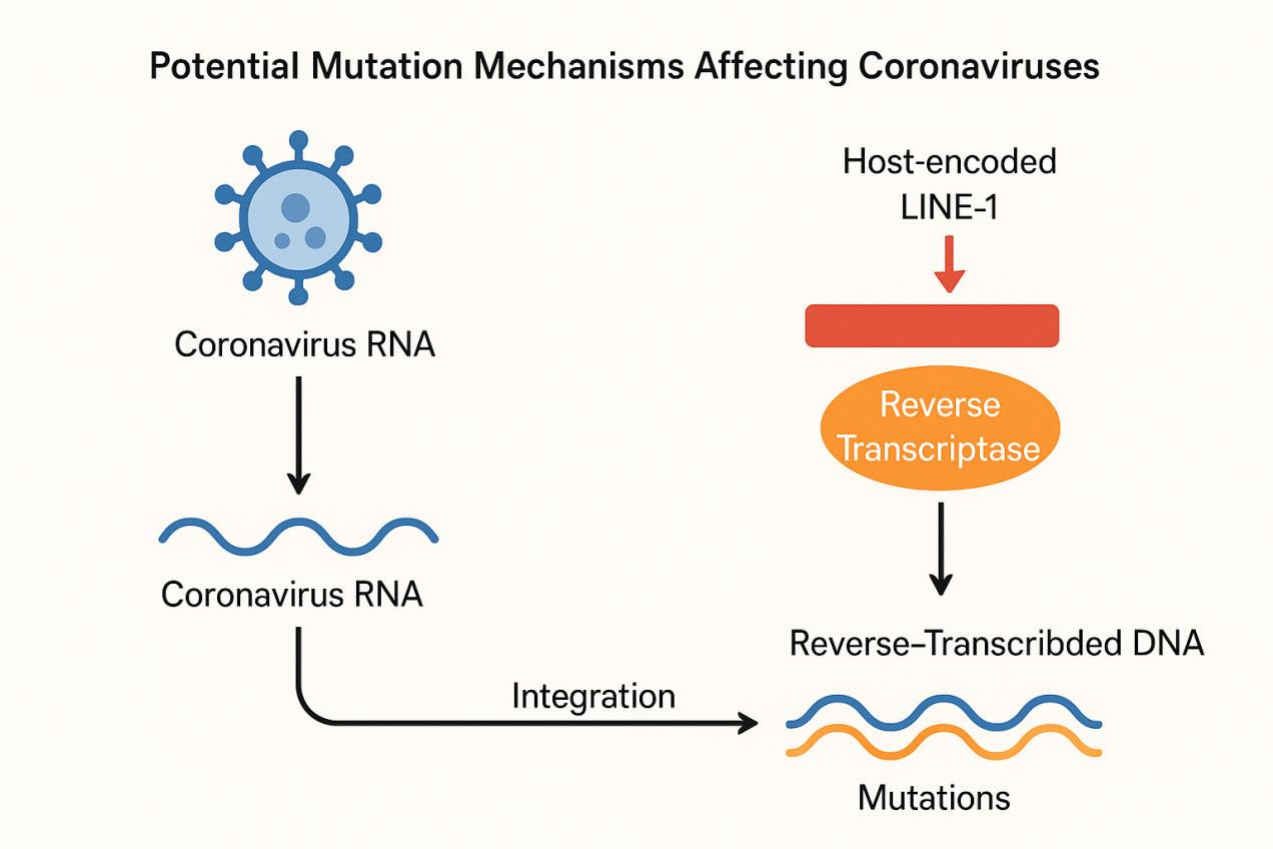

Exhibit 14

[4] Horowitz LG. Covid cancer induction: "Stealth virus" gain-of-function bio weaponized genetic payload and spike protein mutagenesis prompting immunopathologies. Acta Scientific Medical Sciences (ASMS)(ISSN: 2582-0931); Vol. 8; Issue 7; June 27, 2024. Online at: https://actascientific.com/ASMS/ASMS-08-1865.php.

It is known that in some experimental systems, reverse transcriptase (e.g., from HIV) has been used to reverse-transcribe coronavirus RNA to DNA for research purposes. Dr. Baric's UNC cohorts routinely manufactured recombinant viruses from RNA-Dependent DNA Polymerase (i.e. reverse transcriptase) pivotal to AIDS pathogenesis from HIV-1. This is evidenced by Baric et. al.'s publication shown in **Figure 16**, and summarized below pursuant to "High Rick Conditions for Oncogenesis" from coronavirus mutagenesis.

🧠 Summary of High-Risk Conditions for Oncogenesis:

Risk Factor	Potential Oncogenic Outcome
verse transcription & DNA integration	sertional mutagenesis
ronic inflammation	NA damage, proliferation of lymphocytes
mune suppression	activation of oncogenic viruses like EBV
ng COVID / persistent infection	stained oxidative stress and immune dysregulation
tiviral or immunosuppressive therapy	ss of tumor surveillance

---

Baric and his cohorts extensively studied coronaviruses, including reverse genetic systems for **SARS-CoV**, **MERS-CoV**, and **SARS-CoV-2**. They conducted such lab activities contemporaneously with the aforementioned COVID crimes. Their systems often involved:

- **Synthesizing cDNA copies of coronavirus RNA genomes**,
- **Cloning them into bacterial artificial chromosomes or plasmids**,
- Then **transcribing them back into infectious RNA** for in vitro or in vivo experiments.

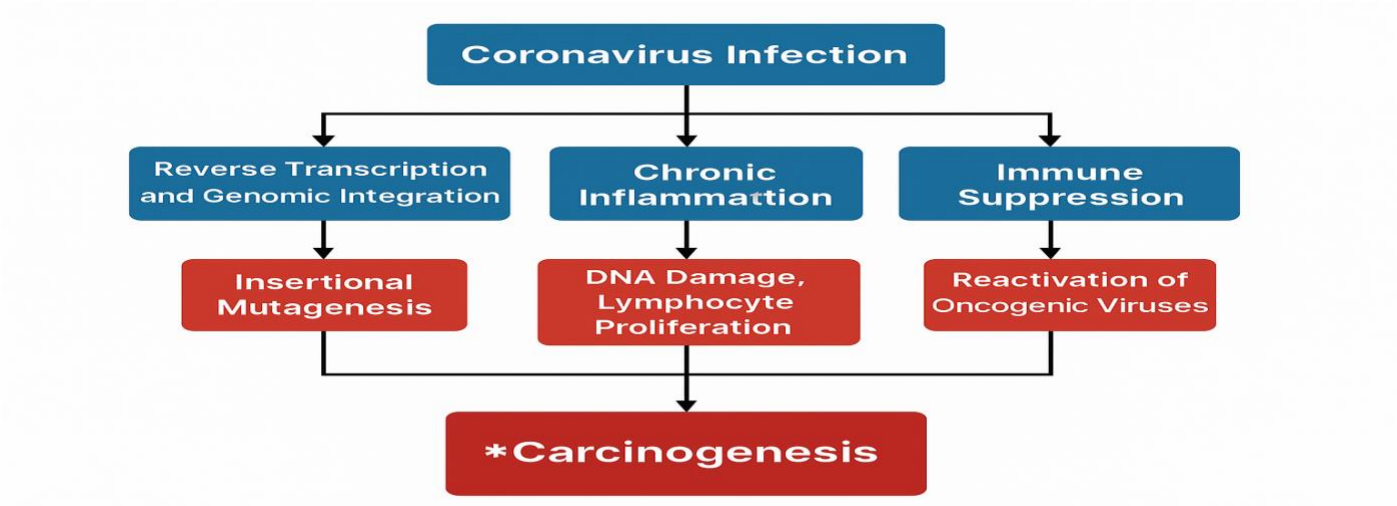

Exhibit 15

Accordingly, assertions by skeptics are unconvincing. As are all arguments by suspects in the CVVRE claiming the lab virus genome and polymerase endowment precluded the manufacturing capabilities proven to exist. Such false defenses compound evidence of criminal concealment.

Elsevier

Cell. 2020 May 27;182(2):429–446.e14. doi: 10.1016/j.cell.2020.05.042

SARS-CoV-2 Reverse Genetics Reveals a Variable Infection Gradient in the Respiratory Tract

Yixuan J Hou [1,19], Kenichi Okuda [3,19], Caitlin E Edwards [1,19], David R Martinez [1,19], Takanori Asakura [3], Kenneth H Dinnon III [2], Takafumi Kato [3], Rhianna E Lee [3], Boyd L Yount [1], Teresa M Mascenik [3], Gang Chen [3], Kenneth N Olivier [16], Andrew Ghio [17], Longping V Tse [1], Sarah R Leist [1], Lisa E Gralinski [1], Alexandra Schäfer [1], Hong Dang [3], Rodney Gilmore [3], Satoko Nakano [3], Ling Sun [3], M Leslie Fulcher [3], Alessandra Livraghi-Butrico [3], Nathan I Nicely [4], Mark Cameron [11], Cheryl Cameron [12], David J Kelvin [10,18], Aravinda de Silva [2], David M Margolis [2,5,6], Alena Markmann [5], Luther Bartelt [5], Ross Zumwalt [13], Fernando J Martinez [14], Steven P Salvatore [15], Alain Borczuk [15], Purushothama R Tata [9], Vishwaraj Sontake [9], Adam Kimple [7], Ilona Jaspers [8], Wanda K O'Neal [3], Scott H Randell [3], Richard C Boucher [3,*], Ralph S Baric [1,2,20,**]

Author information · Article notes · Copyright and License information

PMCID: PMC7250779 PMID: 32526206

Abstract

The mode of acquisition and causes for the variable clinical spectrum of coronavirus disease 2019 (COVID-19) remain unknown. We utilized a reverse genetics system to generate a GFP reporter virus explore severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2) pathogenesis and a luciferas reporter virus to demonstrate sera collected from SARS and COVID-19 patients exhibited limited cros CoV neutralization. High-sensitivity RNA *in situ* mapping revealed the highest angiotensin-converting enzyme 2 (ACE2) expression in the nose with decreasing expression throughout the lower respirator tract, paralleled by a striking gradient of SARS-CoV-2 infection in proximal (high) versus distal (low) pulmonary epithelial cultures. COVID-19 autopsied lung studies identified focal disease and, congruent with culture data, SARS-CoV-2-infected ciliated and type 2 pneumocyte cells in airway and alveolar regions, respectively. These findings highlight the nasal susceptibility to SARS-CoV-2 with likely subsequent aspiration-mediated virus seeding to the lung in SARS-CoV-2 pathogenesis. These reagen provide a foundation for investigations into virus-host interactions in protective immunity, host susceptibility, and virus pathogenesis.

Back to Top

Feedback

Results

Recombinant viruses replicate similarly to the SARS-CoV-2 clinical isolate *in vitro*

A full-length infectious complementary DNA (cDNA) clone of a US SARS-CoV-2 clinical isolate WA1 was generated by cloning seven genomic fragments separately into vector plasmids (Figure 1 A). Additionally, two reporter viruses were constructed by replacing a 276-bp region in ORF7 with a green fluorescent protein (GFP) or a GFP-fused nanoluciferase (nLuc) gene (Figure 1A). After assembly into full-length cDNA, full-length RNA was electroporated into Vero-E6 cells (Scobey et al., 2013, Yount et al., 2003). After recovering the wild-type (WT), icSARS-CoV-2-GFP, and icSARS-CoV-2-nLuc-GFP recombinant viruses, viral replication was confirmed by the presence of sub-genomic-length leader-containing RNA transcripts 20 h after electroporation (Figure S1). All three recombinant viruses replicated (Figure S1), generated similar plaques in Vero E6 cells, and could be passaged serially in the cell culture without exogenous trypsin (Figure 1B). We defined cytopathic effect (CPE) by cell rounding and detachment from monolayers. GFP signals were evident in cells two days after transfection with RNA transcripts from both indicator viruses (Figure 1C).

Exhibit 16

D. Legal Standards

1. Conspiracy to Violate Biological Weapons Prohibition 18 U.S. Code § 175(a)(b) (Against Baric, Cahoon, Collins, Fauci, Dailey, Daszak, EcoHealth, Lieber, Langer, Harvard, MIT, Moderna, Timothy Alan Springer and Derrick Rossi, Pfizer, DARPA, the NIH, NIAID, FBI and CIA)

COVID-19 and its production by NIH Grantee Ralph Baric et. al.,, under Project Number 1P01AIO59443-01A1, and subsequent distribution/trafficking, fraudulent concealments, commercialization and false advertising by the captioned parties, violates **18 U.S. Code § 175(a)(b),** justifying criminal prosecution for illegal biological weapons productions and trafficking.

Exemptions and exceptions are not available here for "prophylactic, protective, bona fide research, or [for] other peaceful purposes," because it is unreasonable to conclude that the deadly outcomes derived from lab mutations, deceptions and censorship might be construed as anything other than malicious military and pharmaceutical dual purpose activity.

The COVID-19 mutagen incorporated a "gain-of-function" spike protein bioweapon—a concealed AIDS-laced antigen disease trigger—developed to genetically weaponize the "novel" lab virus and related pharmaceuticals to immunologically assault, damage, and kill people. A certain number of deaths were expected, but concealed or minimized by omissions, misrepresentations, and frank fraud by the co-conspirators.

The resulting mRNA bioweapons and interlaced chemical weapons featured the poisonous lipid hydrogel graphene nano-biotechnology sequestered or otherwise falsely promoted as "safe." Subsequently, the FDA's hurried vaccine drug classification and approval has come under fire following substantial damage, disease and deaths caused. The CVVRE's biochemically-weaponized invention(s) and its (their) deployment(s) satisfies the elements of crime under **18 U.S. Code § 175(a)(b)** that establishes "Prohibitions with respect to biological weapons." This law states in relevant parts:

Whoever knowingly develops, produces, stockpiles, transfers, acquires, retains, or possesses any biological agent, toxin, or delivery system for use as a weapon [that "includes the development, production, transfer, acquisition, retention, or possession of any biological agent, toxin, or delivery system for other than prophylactic, protective, bona fide research, or other peaceful purposes."] or knowingly assists a foreign state or any organization to do so, or attempts, threatens, or conspires to do the same, shall be fined under this title or imprisoned for life or any term of years, or both."

a. Unreasonable Defenses and Counter Arguments

Applicable here, the designation "for use as a weapon" cannot be contested in lieu of the fact the COVID-19 virus was bioweaponized to manufacture a deadlier immune intoxicating virus. The "gain-of-function" spike protein antigen (i.e., mutagen) was expressly engineered to disable and evade normal natural immunological defenses and genetic integrity.

Any defense cannot reasonably justify the COVID-19 virus development as "prophylactic, protective; or bona fide research" conducted for "peaceful purposes" because the mutagen was deliberately engineered to maliciously assault and disable human immune mechanisms, alter DNA function, and

subvert natural genetic regulatory mechanisms. Any reasonable person or juror cannot reasonably and responsibly consider this bioweaponized assault "prophylactic, protective; or bona fide research conducted for "peaceful purposes."

In fact, under local and international laws, including the Statute of the International Court of Justice (United Nations [UN]) 33 UNTS 993, UKTS 67 (1946) Cmd 7015, 3 Bevans 1179, 59 Stat 1055, 145 BSP 832, TS 993, Ch.II Competence of the Court, Art.38, (1), (b) "it seems impossible to speak of a principle of peaceful purposes under customary international law" let alone the weaponization of biological and chemical functions to induce diseases and deaths. "Rather, the legal meaning of the concept [of 'peaceful purposes' for 'bona fide research in prophylactic and protective purposes'] is to be determined on a case-by-case basis (cf Subedi 54–66), depending, inter alia, on the object and purpose of each specific provision in which it is employed (Treaties, Object and Purpose)."

In this clear and convincing case of white collar COVID crime, the "object and purpose" was to manufacture a bioweaponized COVID-19 virus featuring the immunologically-damaging spike protein "gain-of-function" antigen producing genetic alterations and a never-before-seen deadly respiratory disease suitable for military deployment, depopulation, and drug commerce favoring investors.

Additionally, under **18 U.S. Code § 175(a)(b),** "Whoever knowingly possesses any biological agent, toxin, or delivery system of a type or in a quantity that, under the circumstances, is not reasonably justified by a prophylactic, protective, bona fide research, or other peaceful purpose, shall be fined under this title, imprisoned not more than 10 years, or both. In this subsection, the terms "biological agent" and "toxin" do not encompass any biological agent or toxin that is in its naturally occurring environment. Here, the biological agent or toxin has been cultivated, collected, or otherwise extracted from its natural source." In this alleged crime, it cannot be reasonably claimed that the COVID-19 bioweaponized pathogen came from a "natural source," because it was manufactured initially in Dr. Baric's UNC lab, and then trafficked under NIH, NIAID and military grants and private commercial contracts by the suspects.

Furthermore, it is unreasonable to argue that Dr. Baric's lab development of the bioweaponized COVID-19 virus satisfied the "overall goals" of the "proposed Program Project" contracted, as published by the NIH in **Exhibit 17**. The manufactured bioweapon and toxic mRNA vaccine/drug did not "identify the genetic determinants of SARS-CoV pathogenesis and virulence." Instead, a new virus was engineered and bioweaponized with the "gain-of-function" spike protein antigen to usurp and augment the genetic determinants of COVID-19 pathogenesis and virulence. Instead of serving the published contract and public health, the suspects manufactured novel gene sequences and the genetic determinants of COVID-19's pathogenesis to induce virulence, DNA dysfunction, and disease outcomes.

This activity cannot be reasonably construed, argued, or excused as satisfying the goal to develop "live attenuated, killed, and recombinant virus vaccines that protect animal models from wild type virus challenge," because: (1) the subject mRNA bioweaponized virus cannot be considered a live, attenuated, or killed recombinant virus *from the wild*; and (2) the vaccine has never been proven safe or effective against any "wild type virus challenge," because the lab virus itself was bioengineered.

Consequently, the deadly and damaging acts committed by the aforenamed suspects, along with the exhibited evidence provided herein, provide substantial 'probable cause' for Justice Department referrals and prosecutions by state and federal law enforcers.

Developing Vaccine Candidates for the SARS Coronavirus

Project Number	Contact PI/Project Leader	Awardee Organization
1P01AI059443-01A1	BARIC, RALPH S	UNIV OF NORTH CAROLINA CHAPEL HILL

Description

Abstract Text

DESCRIPTION (provided by applicant): The overall goals of the proposed Program Project are to identify the genetic determinants of SARS-CoV pathogenesis and virulence, and develop candidate live attenuated, killed, and recombinant virus vaccines that protect animal models from wild type virus challenge. The Program is based on extensive preliminary studies by an existing team with considerable expertise in coronavirus molecular genetics and replication, viral pathogenesis and vaccine design. Two overall hypotheses are central to the Program Project, both based on extensive molecular genetic and immunologic studies on coronavirus. We hypothesize that mutagenic inactivation of various genes and functional domains will reveal the molecular determinants of SARS pathogenesis and virulence following introduction of recombinant viruses into small animal models. These studies will allow for concurrent development of live attenuated viruses that could be used directly as vaccines, or as seed stocks for developing safer "killed" vaccines. This hypothesis is supported in the preliminary empirical studies demonstrating that specific mutations and genetic deletions can be introduced into the SARS-CoV genome and the successful rescue of viable viruses. Our second hypothesis is that existing virus vaccine platforms, either alone or in combination, will induce strong protective immune responses against the SARS-CoV. Thus, we anticipate that the project will 1) rapidly identify genetic determinants of SARS-CoV pathogenesis and virulence; 2) produce a number of attenuated SARS viruses that serve as seed stocks for safer candidate live or killed vaccines and recombinant vaccines; 3) evaluate the efficacy of early vaccine candidates in animals; and 4) select the best of these for further evaluation. Concordant with these pathogenesis and vaccine studies, the program uses SARS-CoV as a model to attack fundamental issues regarding the safety of live attenuated viruses that are germane to many important RNA and DNA viruses. Consequently, the program addresses a number of basic questions that are germane to elucidating the molecular mechanisms governing the evolution and the emergence of new coronaviruses in humans. Finally, the program develops a large number of novel reagents that will propel SARS-CoV research forward, including the development of an infectious cDNA, novel recombinant viruses, recombinant proteins, and antiserum directed against the SARS-CoV proteome.

Exhibit 17

2. Conspiracy to Violate Federal RICO Prohibition, 18 U.S. Code § 1962(d).

Baric, the UNC, Fauci, NIAID, Collins, the NIH, Dailey, Harvard, Daszak, EcoHealth, the CIA, FBI, Lieber, Langer, Moderna officials Timothy Alan Springer and Derrick Rossi, Pfizer and its for-profit entities, have undertaken the alleged criminal and fraudulent acts described above as part of a common scheme. These suspects willfully, knowingly, and unlawfully conspired, confederated, and agreed together and with others to violate 18 U.S.C. § 1962(c), in violation of 18 U.S.C. § 1962(d).

The alleged co-conspirators intentionally concealed their fraudulent conduct, preventing opposition from discovering their scheme, notwithstanding exercise of due diligence. The "racketeering activity" alleged here, as defined by 18 USC § 1961(1), includes violations of section 1341 (relating to mail fraud); section 1343 (relating to wire fraud); section 1344 (relating to financial institution fraud); section 1503 (relating to obstruction of justice [within the FBI]); section 1510 (relating to obstruction of criminal investigations [within the FBI]); sections 175–178 (relating to biological weapons); and sections 229–229F (relating to chemical weapons).

The aforementioned persons were aware of their scheme and illegal activity. Alternatively, they aided-and-abetted the scheme and illegal activity by willful blindness and recklessness in their actions within the alleged racketeering Enterprise.

The FBI and CIA et. al. knew, but fraudulently concealed, that Harvard's Charles Lieber had pioneered (with UNC associate Cahoon, Ralph Baric, Chinese agents, and MIT and Moderna co-investigators, including Robert Langer) key nano-bioelectronic technologies pivotal to mRNA vaccine delivery (i.e., the lipid hydrogel functions). These actions and lab creations produced immunological and neurological dysfunctions, genetic subversions, diseases, and deaths.

The FBI and CIA, along with Harvard's Dean Daley, Anthony Fauci, Peter Daszig and others, fraudulently concealed Chinese government and military investments in the bio-weaponization of COVID-19 "gain-of-function" spike protein antigen enabling Baric's and Moderna's mRNA vaccines to subvert human immunological defenses and corrupt normal/natural genetic expression in biodefense. All of their alleged crimes favored drug commerce, unjust enrichment, and depopulation. The named co-conspirators knew of, and agreed to facilitate, the operations of the CVVRE and pandemic scheme.

Dr. Fauci and NIH Director Collins, under the influence of public and private Enterprise financiers, directed scientific and lay media censorship, omissions, misrepresentations, and fraud to advance this illegal scheme and commit the racketeering activity alleged hereinabove.

Each named suspect understood, knew, or should have known, that he or it was committing numerous RICO predicate acts and participating in a racketeering Enterprise and 'plandemic' scheme, evidenced among other things by his or its overt acts and involvements in repeatedly promulgating false and/or misleading representations via wire transmissions, email correspondence, online transmittals, social media posts, Congressional testimonies, mass media interviews, drug advertisements, and terroristic threatening of the public to induce social acceptance and compliance with deadly vaccine mandates.

The named suspects knew, or should have known, their predicate acts were part of a pattern of racketeering activity, but nonetheless agreed to the commission of those acts to further the CVVRE scheme. They agreed and conspired to conduct and participate in the affairs of the Enterprise through a

consistent and continual pattern of racketeering activity that resulted in diseases and millions of deaths. Further evidence of the agreement among the named Enterprise agents is peculiarly within the knowledge and control of the suspects.

Second-degree murder is typically murder with malicious intent but not premeditated. The mens rea of such defendants is intent to kill, intent to inflict serious bodily harm, or to **act with an abandoned heart (e.g., reckless conduct lacking concern for human life or having a high risk of death)**. Accordingly, in the interest of justice and law enforcement, the named suspects must be investigated, indicted, and prosecuted for second-degree murder, inter alia.

As a direct and proximate result of the suspects' alleged conspiracy and violations of 18 U.S.C. § 1962(d), millions of citizens, like the petitioner Dr. Leonard G. Horowitz, has been injured bodily, in their businesses and/or properties, to be evidenced at trial(s). These damaged parties are entitled to treble damages, attorneys' fees, and costs of suit.

By this Notice, the Petitioner demands the NIH, under Dr. Bhattacharya's directorship, and HHS Secretary Kennedy, and AG Bondi, officially investigate these matters, respond in writing to this Notice within thirty (30) days, and refer the criminal evidence presented herein to: (a) responsible officials in the Department of Justice; (b) the FBI and responsible intelligence community overseers; (c) members of Congress ; (d) the National Security Agency ("NSA"); (e) the U.S. Food and Drug Administration; (f) the Centers for Disease Control & Prevention ("CDC"); and (g) President Donald J. Trump.

Sincerely yours,

Leonard G. Horowitz, DMD, MA, MPH, DNM (hon.)
Editor-in-Chief, Medical Veritas International Inc.

Cc: Dr. Mehmet Oz, Administrator of CMS
Dr. Marty Makary, FDA Commissioner
Dr. Casey Means. U.S. Surgeon General
Tulsi Gabbard, Director National Intelligence
Kash Patel, FBI Director
Rep. Brad Wenstrup
Sen. Rand Paul
Rep. James Comer
Rep. Marjorie Taylor Green
President Donald J. Trump