

**COUNTER-AFFIDAVIT OF TRUTH PURSUANT TO RULE 15 CONTINUANCES TO THE
NEVADA RULES OF CRIMINAL PRACTICE**



I, a man, am over the age of consent, am of sound mind, am a creation of God-Almighty and a follower of God's laws first and foremost, and the laws of man when they are not in conflict (Leviticus 18:3,4). Pursuant to Matthew 5:33-37 and James 5:12, let my yea be yea, and my nay be nay, as supported by Federal Public Law 97-280, 96 Stat. 1211 - *"Whereas the Bible, the Word of god, has made a unique contribution in shaping the United States as a distinctive and blessed nation and people"* and *"Whereas Biblical teachings inspired concepts of civil government that are contained in our Declaration of Independence and the Constitution of the United States"* and *"Whereas..the Bible is "the rock on which our Republic rests"."* I have personal knowledge of the matters stated herein and hereby asseverate, understanding both the spiritual and legal liabilities of, "Thou shall not bear false witness against thy neighbor".

1. This counter-affidavit has been prepared in response to prosecutor Rinetti's frivolous and meritless January 28, 2025, "STATE'S NOTICE OF MOTION AND MOTION TO CONTINUE AND STATE'S MOTION FOR DISCOVERY ON AN ORDER SHORTENING TIME", pursuant to Rule 15 (Continuances) to the NEVADA RULES OF CRIMINAL PRACTICE.

2. On page 14 of prosecutor Rinetti's motion, she states:

*"While some of Dr. Semelka's claims may be rebutted by previously disclosed State experts, Dr. Semelka's opinion that the child experienced "**Gadolinium Deposition Disorder**"* secondary to the MRI, which thus worsened his overall condition" necessitates the State hiring an additional expert."*

***Prosecutor Rinetti was put on NOTICE of (GDD - Gadolinium Deposition Disorder aka Gadolinium Deposition Disease) over 5 years ago (see 1st NOTICE below in paragraph 3) and elsewhere as stated herein.**

3. The prosecutor's statement (above) that it is necessary to hire an additional expert is patently absurd given the following **facts**:

On 5/4/2020, former prosecutor Jobe filed her STATE'S NOTICE OF WITNESSES AND/OR EXPERT WITNESSES [NRS 174.234]. She listed no less than 21 "experts":

Alhosh, Rabea, MD
Austad, Miguel, BCFD
Dugan, Mark, MD
Fisher, Rachel, MD
Forage, James, MD - neurosurgeon
Hadley, Harold, BCFD
Halhore, Srinivas, MD - neurologist
Hoye, Steven, MD - radiologist
Kas-Osoka, Oriaku, MD
Krebs, Steve, MD
Orenstein, Julian, MD
Quinlan, Jennifer, DO
Rodriguez Solares, Adib, MD
Rowles, Shawn, MD
Scherr, Rebecca, MD
Shah, Rita, MD

Shea, Brian, BCFD
Tolentino, Jeanette, MD
Trautwein, John, MD
Walton, Nigel, BDFD
Wong, Benjamin, MD

Both prosecutor's were put on NOTICE a great many times that I truthfully stated OVER AND OVER that the gadolinium (element #64) in the MRI contrast dye (Gadavist), directly and immediately injured my son which is also confirmed by the UMC Children's Hospital surveillance video courtesy of the grossly inept BCPD detective Christopher Slack. The FACT that prosecutor Rinetti doesn't already have an expert rebuttal witness for all aspects gadolinium toxicity/poisoning is irrefutable evidence of:

- prosecutorial misconduct
- bad faith
- ethical violations
- failure to prepare
- abuse of procedure
- prejudice to the defense
- due process violations
- judicial economy violation
- unreasonable delay in justice

Prosecutor Rinetti took over this case around August 2023 which means she has been responsible for this frame-up of a case for approximately 18 months. In all this time, she didn't correctly plan/anticipate she'd need this type of rebuttal witness? **THIS IS PATENTLY ABSURD/INEXCUSABLE BASED UPON THE EXTENSIVE NOTICES/INFORMATION/ COURT FILINGS/EMAILS SHE WAS PROVIDED REPEATEDLY FROM THE RECORD MADE BEFORE THIS COURT:**

1st NOTICE - filed 1/27/2020 (over 5 years ago): JOINT DECLARATION OF DEFENDANTS' SACHS AND ZHANG IN RESPONSE TO PLAINTIFF'S RETURN TO WRIT OF HABEAS CORPUS FILED FOR ZHANG AND JOINTED BY SACHS

From page 2 of 18 and 3 of 18:

On the sixth and last day of Eason's first admission to UMC, Saturday, January 26, 2019, Eason was given an ultra toxic MRI contrast dye called gadavist which contains the heavy metal gadolinium. Gadavist is so dangerous, it carries what is called a "Black Box Warning" which "appears on a prescription drug's label and is designed to call attention to serious or life-threatening risks" (Please see EXHIBIT 5). This caution dates all the way back to 2007 when the FDA mandated "Black Box Warning on the packages of all Gadolinium-containing contrast agents" (Please see EXHIBIT 6). In December 2017, the FDA required "a new class warning and other safety measures for all gadolinium-based contrast agents (GBCAs) for magnetic resonance imaging (MRI) concerning gadolinium remaining in patients' bodies, including the brain, for months to years after receiving these drugs" (Please see EXHIBIT 7 - 2 pages). The FDA, in this same new class warning which includes gadavist stated, "We have also received reports of adverse events involving multiple organ systems in patients with normal kidney function (EXHIBIT 8 - 2 pages). Bayer HealthCare Pharmaceuticals, makers of gadavist state in the package insert, "Consequences of gadolinium retention in the brain have not been established" and "certain patients might be at higher risk" which includes "pediatric patients" (Please see EXHIBIT 9 - 3 pages). On this same Bayer insert it states the

*“following additional adverse reactions have been reported during postmarketing use of Gadavist”, “oropharyngeal swelling” (throat swelling), “fatigue”, “asthenia” (abnormal physical weakness or lack of energy), and “heterogeneous clusters of symptoms in the neurological, cutaneous, and musculoskeletal systems” (diverse in character symptoms of the brain/nerves/muscles/skin/bones/ligaments/tendons) (Please see EXHIBIT 10). The Bayer “Medication Guide” which was supposed to be given to my wife and Alex states, “patients have reported pains, tiredness, and skin, muscle or bone ailments for a long time” and “young children may be at increased risk from gadolinium staying in the body” and “the most common side effects of Gadavist include....dizziness....these are not all the possible side effects of Gadavist” (EXHIBIT 11). There was a direct **cause and effect** from gadavist being injected in Eason’s body because after the MRI, he had all the appearances of a full blown autistic vegetable. This incompetent children’s hospital and its staff turned our formerly normal boy into a stiff, frothing at mouth, zombie (Please see EXHIBIT 12 pictures - 17 pages). Please see and compare EXHIBIT 12 pictures to EXHIBIT 13 pictures - 7 pages which were taken by CPS two days after Eason’s appointment with our naturopathic doctor, Dr. Gois (Renaissance Health Centre). This comparison serves to show Eason was always a thin/skinny boy and that the weight he lost was due to the MRI contrast dye gadavist. “During the period 2008-2015, more than 1,000 lawsuits were filed against the manufacturers of Gadolinium-Based Contrast Agents (GBCA). When these lawsuits occurred, healthcare providers were told only patients with renal and kidney issues could suffer from the use of gadolinium-based contrast agents. **This has proven to be wrong.** Severe injuries have now been found in patients with normal kidney function who underwent an MRI” (Please see EXHIBIT 14). “Regardless of warnings doctors keep pushing gadolinium.*

Gadolinium Deposition Disease (GDD) is

when those with normal or near normal renal (kidney) function develop persistent symptoms that arise within two months after administration of GBCA’s. Symptoms include....bone and joint pain....tightness in hands and feet....cognitive difficulties and central nervous system problems. Many end up bedridden or in wheelchairs due to their loss of mobility and pain. It doesn’t matter a patient’s health beforehand. Doctors are not educating patients on the side effects of this dye” (Please see EXHIBIT 15 - 2 pages). The connection between Eason’s maladies and gadavist shall be conclusively proved further below in this Joint Declaration.

[TAKE NOTICE OF THE FACT (above) THAT “Gadolinium Deposition Disease (GDD)” was brought to the State’s attention over 5 years ago!]

From page 13 of 18 and page 14 of 18:

Sometime around 4pm, after UMC staff informed my wife that Eason was going to be discharged, my wife requested a school note for Eason. Dr. Brook Finger gave my wife a form entitled “HOSPITAL CERTIFICATE TO RETURN TO WORK OR SCHOOL” and checked off the box that states, “The above patient was seen today and is able to return to work or school on 2/4/19” (Please see EXHIBIT 71). This serves to prove Dr. Finger was just as irresponsible as the other UMC doctors in coming up with a return date to school that had no basis in reality. When I went to pick up Eason and my wife at UMC around 6:30pm I was appalled at what I saw. Eason displayed the physical symptoms of a full blown autistic child. He appeared lifeless. I was heartbroken but determined to get Eason away from this pathetic excuse of a children’s hospital. As soon as I picked Eason up and held him against my body, he urinated all over me. I knew right then that Eason had been poisoned from the MRI and also knew that he needed to be detoxed. There is

a direct connection between the gadavist MRI contrast dye and Eason's subsequent weight loss and encephalopathy and cachexia (weakness and wasting of the body due to severe chronic illness). The following is clear and irrefutable proof:

The connection between gadavist and weight loss (Please see EXHIBIT 72).

"Bayer Sued After MRIs Result in Gadolinium Toxicity." Weight loss from Gadavist is specifically referenced in this article from Arentz Law Group.

The connection between weight loss and cachexia (Please see EXHIBIT 73).

"Everything you need to know about cachexia. **Cachexia** is a condition that **causes extreme weight loss** and muscle wasting."

The connection between gadolinium and cachexia (Please see EXHIBIT 74).

"Case-control study of gadodiamide-related nephrogenic systemic fibrosis."

Gadodiamide is a gadolinium-based MRI contrast agent. "Although some patients experience mild courses of NSF (Nephrogenic systemic fibrosis), a large proportion of affected patients progress into contractures, severe immobility, **cachexia** and in some cases even death occurs." This journal article is from NDT, Nephrology Dialysis Transplantation, 2007.

The connection between gadavist and cachexia (Please see EXHIBIT 75 - 4 pages).

"Nephrogenic systemic fibrosis and gadolinium-based contrast media: updated ESUR Contrast Medium Safety Committee guidelines." "The link between nephrogenic systemic fibrosis (NSF) and gadolinium-based contrast agents was recognized in 2006. Clinical features of NSF.....Onset: From the day of exposure for up to 2-3 months, sometimes up to years after exposure.....Result.....**Cachexia**.....Death, in a proportion of patients.....Contrast agents....Gadobutrol (Gadovist, **Gadavist**). "There is still concern NSF is only the 'tip of the gadolinium toxicity iceberg.'" This journal article is from ESUR, European Society of Radiology, 2012.

The connection between gadavist and encephalopathy I. (Please see EXHIBIT 76 - 3 pages). "Gadolinium-based contrast agents lawsuit." "The journal Applied Radiology reports that recent cases of toxicities related to GBCAs have included gadolinium-induced **encephalopathy**."

The connection between gadavist and encephalopathy II. (Please see EXHIBIT 77 - 2 pages). "Persistence of Gadolinium Contrast Enhancement in CFS: A Possible Harbinger of Gadolinium Neurotoxicity?" "Ultimately, the working diagnosis of gadolinium neurotoxicity was made because no other causes for the patient's **encephalopathy** were discovered." **"It is known that inorganic gadolinium salts are neurotoxic."** This journal article is from AJNR, American Journal of Neuroradiology, 2009.

2nd NOTICE - filed 6/24/2021: AFFIDAVIT OF FACT

From page 3 of 51:

SYNOPSIS OF THE UNREBUTTED TRUTH* OF THIS CASE

11. In response to a mild case of food poisoning from the hidden excitotoxin (MSG - monosodium glutamate) in some food Y.L. consumed on 1/19/2019, my wife called for medical assistance on 1/20/2019 after Y.L. became unresponsive for a brief period of time. Y.L. was initially taken to St. Rose Siena Hospital and was subsequently transferred to UMC Children's Hospital. Without ever properly confirming a diagnosis, the criminally negligent doctors at UMC Children's Hospital administered heavy duty

chemical **poisons** (that were also life threatening per the contraindications from the manufacturers) they called “anti-seizure” medications which quickly incapacitated Y.L. to the point he was not able to walk or talk. To add insult to injury, UMC Children’s Hospital doctors never performed an EEG to confirm whether or not Y.L. was in fact suffering from seizures or not. To add further insult to injury, I, the stepfather, told UMC Children’s Hospital doctors/staff I did not consent to ANY MRI contrast dye if they chose to illegally/unlawfully perform an MRI as I knew from researching this topic previously these MRI dyes were highly toxic. On Y.L.’s last day of medical treatment, 1/26/2019, UMC Children’s Hospital doctors administered Gadavist, a gadolinium based MRI contrast dye, to Y.L. which resulted in Y.L.’s immediate autistic like outward appearances. Dr. Chawla lied on UMC Children’s Hospital medical records that Y.L. was discharged in “good” condition and she failed to record Y.L.’s discharge weight (**See EXHIBIT 66 of the “JOINT DECLARATION OF KIMBALL AUSTIN SACHS AND YUXIA ZHANG”**). Basically, Gadavist is a highly toxic heavy metal put in liquid form to enhance MRI images at the expense of the patients’ health (**See EXHIBIT A - 35 pages**). Translation, Gadavist is good for Bayer HealthCare Pharmaceuticals and bad for patients. The U.S. Food Drug and Administration (FDA) warned in their 12/19/2017 safety announcement that gadolinium could remain in “patients’ bodies, including the brain, for months to years after receiving these drugs.” The 195 page “JOINT DECLARATION OF KIMBALL AUSTIN SACHS AND YUXIA ZHANG” with 90 Exhibits that was submitted to this court proved conclusively and irrefutably the connection between Y.L.’s maladies (weight loss, encephalopathy, cachexia, dehydration, and malnourishment and a whole host of other health problems) and the Gadavist that Y.L. received on 1/26/2019. It apparently **never occurred** to Detective Slack to investigate the fact that UMC Children’s Hospital doctors poisoned Y.L. with such a toxic substance **in spite of the fact** that Detective Slack wrote in his own 3/19/2019 Affidavit, “**Austin said, Eason was brain damaged due to the dyes used during the MRI/brain scan.**” Not only did I inform Detective Slack of this fact, a number of other people told him the same thing based on what I told them. Based on the foregoing, I declare Detective Slack was grossly negligent in his duties (he breached his duties repeatedly) to investigate the OBVIOUS clues presented to him on numerous occasions by numerous individuals that the MRI dye (Gadavist) and the criminally negligent doctors who administered this known poison to Y.L. are directly responsible for all of Y.L.’s health maladies that my wife and I were wrongly blamed for. Clark County Chief Deputy District Attorney Michelle Jobe perpetuated the lies in Detective Slack’s nonexistent “investigation” by **assuming facts not in evidence** instead of reviewing the data/UMC Children’s Hospital medical records to **clear the innocent**, namely that my wife and I, committed no crimes of child neglect/abuse in the STATE OF NEVADA.

*This is the un rebutted truth as none of my filings to include the numerous Affidavits and “JOINT DECLARATION OF KIMBALL AUSTIN SACHS AND YUXIA ZHANG” were ever rebutted point-for-point by any Counter-Affidavits notarized and signed under the penalty of perjury by any man or woman of this court or by the Clark County, NV, District Attorney Steven Wolfson or by Deputy District Attorney Michelle Jobe or by Boulder City Police Department Detective Christopher Slack or by BCPD Detective Brett Wibrew. My un rebutted Affidavits and “JOINT DECLARATION” **stand** as both truth and judgement in commerce.

From page 6 of 51:

36. Detective Slack breached his duty to investigate the fact that the MRI contrast dye, Gadavist, administered to Y.L. at UMC Children’s Hospital on 1/26/2019 caused his weight loss, encephalopathy, and cachexia. (See EXHIBITS 72 thru 77 of the “JOINT DECLARATION OF KIMBALL AUSTIN SACHS AND YUXIA ZHANG”)

45. Detective Slack failed to request and obtain and review the medication package inserts and contraindications/side effects for Y.L., and by doing so he breached his duty to investigate the fact that most of the "medications" given to Y.L. were, in fact, dangerous and life threatening, with Gadavist being the most toxic of all as it has a "black box" warning. (See EXHIBIT 5 and EXHIBIT 6 of the "JOINT DECLARATION OF KIMBALL AUSTIN SACHS AND YUXIA ZHANG")

From 7 of 51:

46. The Bayer HealthCare Pharmaceuticals medication package insert states: "Gadavist is a gadolinium-based contrast agent indicated for use with magnetic resonance imaging (MRI)." Gadavist is also known as gadobutrol per Bayer HealthCare Pharmaceuticals medication package insert (See EXHIBIT 9 of the "JOINT DECLARATION OF KIMBALL AUSTIN SACHS AND YUXIA ZHANG")

47. "Gadolinium is a chemical element with the symbol Gd and atomic number 64" and "Gadolinium is a silvery-white metal" per <https://en.wikipedia.org/wiki/Gadolinium>. (See EXHIBIT A- 35 pages - entitled "WHAT GADAVIST DID TO Y.L.")

48. I did not give consent ever to the doctors at UMC Children's Hospital to administer a MRI contrast dye including the deadly toxic liquid metal, Gadavist, to Y.L..

49. The criminally negligent doctor(s) who administered the life threatening Gadavist to Y.L. did not legally or lawfully provide proper informed consent to my wife about the long list of dangers associated with Gadavist, nor did they inform my wife about the numerous lawsuits filed against the manufacturers of Gadolinium-Based Contrast Agents (GBCA) for personal injuries associated with GBCA's of which Bayer HealthCare Pharmaceuticals Gadavist is a part. (See EXHIBIT 14 of the "JOINT DECLARATION OF KIMBALL AUSTIN SACHS AND YUXIA ZHANG")

50. Detective Slack breached his duty to investigate the fact that the manufacturer of Gadavist, Bayer HealthCare Pharmaceuticals, clearly states in their medication package insert, "Consequences of gadolinium retention in the brain have not been established" and "certain patients might be at higher risk" which includes "pediatric patients". (See EXHIBIT 9 of the "JOINT DECLARATION OF KIMBALL AUSTIN SACHS AND YUXIA ZHANG")

52. Detective Slack breached his duty to investigate the fact that the manufacturer of Gadavist, Bayer HealthCare Pharmaceuticals, clearly goes on to state in their medication package insert, the "following additional adverse reactions have been reported during postmarketing use of Gadavist", "oropharyngeal swelling" (throat swelling), "fatigue", "asthenia" (abnormal physical weakness or lack of energy), and "heterogeneous clusters of symptoms in the neurological, cutaneous, and musculoskeletal systems" (diverse in character symptoms of the brain/nerves/muscles/skin/bones/ligaments/tendons). (See EXHIBIT 10 of the "JOINT DECLARATION OF KIMBALL AUSTIN SACHS AND YUXIA ZHANG")

53. Detective Slack breached his duty to investigate the fact that the manufacturer of Gadavist, Bayer HealthCare Pharmaceuticals, publishes a "Medication Guide" which is supposed to be given to all recipients of Gadavist states, "patients have reported pains, tiredness, and skin, muscle or bone ailments for a long time" and "young children may be at increased risk from gadolinium staying in the body" and "the most common side effects of Gadavist include....dizziness....these are not all the possible side effects of

Gadavist." (See EXHIBIT 11 of the "JOINT DECLARATION OF KIMBALL AUSTIN SACHS AND YUXIA ZHANG")

From page 8 of 51:

54. I personally observed the drastic changes in Y.L.'s condition before and after Y.L. was administered Gadavist on 1/26/2019 noted herein.

55. Hours before Y.L. was administered Gadavist on 1/26/2019, I drove from Boulder City, NV, to UMC Children's Hospital at the request of the biological father, Guohui Liu.

56. My wife was present in Y.L.'s hospital room as was Guohui Liu when I arrived in the early morning hours of 1/26/2019.

57. As I approached Y.L. in his hospital room, Y.L. jumped from his bed into my arms and clung to me tightly.

58. Although Y.L. was able to stand and move on his own, he did not speak.

59. Hours after Y.L. was administered Gadavist, I drove from Boulder City, NV, to UMC Children's Hospital to pickup my wife and Y.L. since Y.L. had been discharged from UMC Children's Hospital on 1/26/2019.

60. When I approached Y.L.'s hospital bed, I observed that Y.L. appeared lifeless as he was not moving, not talking, and not walking.

61. When I picked Y.L. up and held him to my chest, Y.L. urinated all over me.

62. It was obvious to I that UMC Children's Hospital doctor(s) poisoned Y.L. with something during the MRI that was later confirmed by UMC Children's Hospital medical records as Gadavist.

63. My wife witnessed that Y.L. urinated all over me and that Y.L. appeared lifeless, and Y.L. was not able to talk, and Y.L. was not able to walk.

From page 14 of 51 and 15 of 51:

141. Detective Slack wrote in his Affidavit, "Staff stated his body (Y.L.) still too weak due to dehydration and malnourishment."

142. I agree Y.L. was weak due to dehydration and malnourishment **upon proof of claim** that Y.L. was not, in fact, suffering from gadolinium poisoning (heavy metal poisoning) from the Gadavist administered to him by UMC Children's Hospital doctors) on 1/26/2019 and I was providing lawful nonmedical remedial treatment per NRS 200.5085 to address Y.L.'s dehydration and malnourishment.

From page 15 of 51:

146. Detective Slack wrote in his Affidavit, "Ms. Jang said she also explained to Eason's mother and step-father of the repercussions for failing to administer proper medical treatment."

147. I agree with Dr. Jang regarding the repercussions for failing to administer proper medical treatment **upon proof of claim** that Dr. Jang was not criminally negligent in her failure to recognize and properly diagnose the gadolinium (Gadavist) poisoning that was negatively affecting Y.L..

From page 17 of 51:

169. Detective Slack wrote in his Affidavit, "Dr. Pfau said Eason was very emaciated, however stable. Dr. Pfau said he started the VI and did not witness anything further and that Ms. Gois was with **the Eason** and family." "**the Eason**"? It appears Detective Slack does not take the time to read his own Affidavits riddled with spelling errors and factual errors. **Dr. Pfau confirmed Y.L. was "stable"** on the 6th day after being discharged from the inferior and substandard UMC Children's Hospital that poisoned Y.L. with Gadavist. Does Detective Slack understand **WHO** got Y.L. **stable**? Does Detective Slack **understand** what medically **stable** is? According to Merriam-Webster, the medical definition of **stable** is, 1": not changing or fluctuating, 2: not subject to insecurity or emotional illness, 3a: not readily altering in chemical makeup or physical state stable emulsions". The **fact** that my wife and I were able to get Y.L. **medically stable** as confirmed by a **medical doctor**, Dr. Tery Pfau, **speaks volumes** as to the **progress** we were making as caring and diligent parents acting in good faith in accordance with NRS 200.5085.

From page 18 of 51:

173. As a reminder, by the time of Detective Slack's **second boondoggle**, he had already been provided with Y.L.'s "up-to-date" medical records by Brittany Skorek which would have prepared him to ask the most important and relevant questions of UMC doctors like, "what did Gadavist do to Y.L.?" and "has Y.L. been tested for gadolinium poisoning, if not, why not?" and "why was Y.L.'s discharge condition documented as "good"?" and "why would the stepfather need to carry Y.L. out of the hospital on 1/26/2019 if he was released in "good" condition?" and "why is Y.L.'s discharge weight omitted from his medical record?" and "would the Gadavist injection account for Y.L.'s weight loss, cachexia, and encephalopathy, if not, why not?" These are the types of **OBVIOUS** questions a competent police detective would have asked UMC Children's Hospital doctors.

177. Detective Slack wrote in his Affidavit, "Kolt (owner of I.V Vitamin Therapy Clinic) then said when Austin arrived he was carrying Eason in his arms. Austin began conversation by blaming UMC for Eason's appearance/condition."

178. I agree, that I "began the conversation by blaming UMC for Eason's appearance/condition" **upon proof of claim** that UMC did not, in fact, poison Y.L. with Bayer HealthCare Pharmaceuticals Gadavist (gadolinium poisoning).

From page 19 of 51:

182. Detective Slack wrote in his Affidavit, "Kolt then said he and Jeremy stepped away and spoke in private. Kolt returned shortly after and explained to Austin that the VI would not cure Eason and that Eason need to be admitted to hospital."

183. I agree, that the VI (Myers Cocktail IV) would not cure Eason **upon proof of claim** that Kolt Strebel was not, in fact, denying the **same exact service** that Dr. Pfau/Dr. Gois provided **one day prior** which had a tremendously positive effect on Y.L. and was never represented to him to be a cure. The request for Myers Cocktail IV was requested as a safe and effective method to help continue in our progress to heal Y.L. from the Gadavist (gadolinium) poison administered at UMC Children's Hospital.

From page 19 of 51 and 20 of 51:

190. Detective Slack wrote in his Affidavit, "I have contacted both Austin and Yuxia throughout the investigation at the numbers provided."

191. I agree that Detective Slack contacted my wife and I throughout Detective Slack's

investigation **upon proof of claim** that Detective Slack did not, in fact, fail to conduct **anything** that resembled an investigation. **Any** reasonable or prudent person can plainly see from Detective Slack's Affidavit that he was grossly negligent in failing to determine **what** caused Y.L.'s weight loss and encephalopathy and cachexia which was a **massive breach of his duties**. Detective Slack breached his duty to investigate exactly **when** did Y.L.'s weight loss and encephalopathy and cachexia begin. Detective Slack's hearsay Affidavit **does not answer these basic questions**. Detective Slack violated my rights to life, liberty, and property based on **what**? The fact that my wife and I healed Y.L. to the best of our ability in good faith because an inferior hospital **poisoned** Y.L. with a deadly MRI contrast dye (Gadavist) that resulted in Y.L.'s gadolinium poisoning. Detective Slack failed to investigate what was in front of him the **entire time**, Y.L.'s UMC Children's Hospital medical records. I, a layman, took the time to read and learn **exactly** what UMC Children's Hospital did to Y.L. from their medical records which was painstakingly documented in the "JOINT DECLARATION OF KIMBALL AUSTIN SACHS AND YUXIA ZHANG". How **plain** can anyone make this? A boy is injured by a children's hospital. The police detective believes everything the lying doctors tell him. Detective blames the parents for all the boy's injuries (**assuming facts not in evidence**). Detective **never** stops to ask himself, what actually caused the boy's massive problems? Detective never makes the effort to investigate the basic **clues** he was provided time and time again by different people. This is **clear evidence** of multiple breaches of duty on the part of Detective Slack.

From page 20 of 51 and 21 of 51:

197. I agree that Y.L. "suffered substantial bodily harm as a direct result of Yuxia and Austin's failure/neglect to provide proper necessary medical treatment during a critical time" **upon proof of claim** that Detective Slack did not, in fact, fail to investigate and uncover the true culprits to Y.L.'s substantial bodily harm, that of UMC Children's Hospital doctors and their administering a known toxic poison (Gadavist) that stays in the body for an undetermined amount of time according to its manufacturer, Bayer HealthCare Pharmaceuticals.

From page 35 of 51 and 36 of 51:

344. NONE of the grand jury witnesses, save for Dr. Solares, had any personal knowledge of the poison Gadavist administered to Y.L.. Dr. Solares failed to inform the grand jury witnesses of the KNOWN risks and dangers of Gadavist and how it negatively affected Y.L. and how it EXPLAINED PERFECTLY the physical symptoms/maladies that Y.L. was displaying.

From page 40 of 51:

Special Responsibilities of a Prosecutor, states under 3.8(d), 'The prosecutor in a criminal case **shall**: (d) Make timely disclosure to the defense all evidence or information known to the prosecutor that tends to negate the guilt of the accused or mitigates the offense....'. The 1/26/2020 "JOINT DECLARATION" of my wife and I provided 18 pages and 90 EXHIBITS of IRREFUTABLE MEDICAL EVIDENCE/PROOF/DISCOVERY to Ms. Jobe and to the court of the medical connection between Y.L.'s maladies and the Gadavist injected into his bloodstream during the MRI. Former counsel Mr. James Smith told I over the phone after reading the 195 page "JOINT DECLARATION" he was expecting judge Hardy to state to Ms. Jobe at the beginning of the 6/9/2020 Writ of Habeas Corpus hearing, "Ms. Jobe, is this the kind of case you want to be bringing before this court?" It was OBVIOUS to Mr. Smith, an attorney that has been practicing law in the state of Nevada since 1981, that the WEIGHT of evidence and TRUTH in the "JOINT DECLARATION" warranted the immediate dismissal of Ms. Jobe's frivolous and malicious and vindictive case against innocent parents. As it was, judge Hardy

egregiously failed to rule upon the law as Mr. Mitchell Posin (my wife's former counsel) correctly stated in the writ the STATE/DA/Prosecutor/Ms. Jobe failed to provide "legal evidence" to the grand jury as required by NRS 172.135(2) AND judge Hardy FAILED to state what SPECIFIC probable cause he found at the end of the hearing and he also failed to identify what SPECIFIC probable cause he found in his written decision that followed.

From page 41 of 51:

360. Based on the foregoing, I declare the grand jury conducted by Ms. Jobe was unconstitutional and unlawful because it was fundamentally unfair as it repeatedly violated my constitutionally guaranteed due process rights. Furthermore, Ms. Jobe did not have any personal knowledge of what Gadavist did to Y.L.. In fact, Ms. Jobe had no personal knowledge of anything she stated at the grand jury proceeding in full breach of NRS 50.025.

From page 42 of 51:

*367. In spite of UMC Children's Hospital poisoning Y.L. with Gadavist, I provided Y.L. "adequate nutrients" and "food" and was able to get Y.L. "stable" as was confirmed by Dr. Terry Pfau (Renaissance Health Centre). (See **EXHIBIT 88 in the "JOINT DECLARATION OF KIMBALL AUSTIN SACHS AND YUXIA ZHANG"**)*

*368. In spite of UMC Children's Hospital poisoning Y.L. with Gadavist, I provided Y.L. "necessary" nonmedical remedial "treatment" per NRS 200.5085 and was able to get Y.L. "stable" as was confirmed by Dr. Terry Pfau (Renaissance Health Centre). (See **EXHIBIT 88 in the "JOINT DECLARATION OF KIMBALL AUSTIN SACHS AND YUXIA ZHANG"**)*

[TAKE NOTICE OF THE FACT THAT EXHIBIT A TO THE 6/24/2021 AFFIDAVIT OF FACT IS ATTACHED TO THIS COUNTER-AFFIDAVIT AS EXHIBIT "A" WHICH MAKES IT CRYSTAL CLEAR TO ALL REASONABLE MEN AND WOMEN WITH FUNCTIONING BRAINS WHO CAN READ AND UNDERSTAND BASIC ENGLISH THAT GADOLINIUM IS DANGEROUS - FACTS SO PAINFULLY OBVIOUS THAT IT IS EQUALLY OBVIOUS THAT prosecutor Rinetti WILLFULLY AND WANTONLY IGNORED/DISREGARDED ALL OF THIS INFORMATION FROM A COLLEGE EDUCATED MAN THAT USED TO WORK FOR THE NATIONAL INSTITUTES OF HEALTH (NIH) - THE FACT THAT I AM COLLEGE EDUCATED AND WORKED FOR THE NIH WAS DISCLOSED IN THE 1/27/2020 JOINT DECLARATION]

3rd NOTICE - filed 10/15/2021: MOTION TO COMPEL THE COURT TO TAKE MANDATORY "JUDICIAL NOTICE OF ADJUDICATIVE FACTS AND LAW"

From page 2 of 6:

5. The prosecutor has NO personal knowledge of anything that happened in this case. The prosecutor did NOT witness the change in Y.L. before and after the administration of the uber toxic Gadavist MRI contrast dye that carries an EDA "Black Box warning"

label designed to call attention to serious or life-threatening risks that also contains the metal element gadolinium. The prosecutor knows NOTHING about the dangers of gadolinium MRI contrast dyes. The prosecutor did NOT ask a single question of the grand jury witnesses about Gadavist. The grand jury jurors did not hear or learn a single thing about the Gadavist given to Y.L. and what it did to him. The prosecutor failed to reveal this MATERIAL exculpatory evidence to the grand jurors. The prosecutor committed serious prosecutorial misconduct repeatedly as detailed in my 6/24/2021 AFFIDAVIT OF FACT on file with the court.

6. Whatever "theory" of the case the prosecutor concocts, it SHALL be a fabrication from beginning to end. This case is only understandable to reasonable men or women that hear the truth, the whole truth, and nothing but the truth that already exists in my AFFIDAVITS and JOINT DECLARATION.

4th NOTICE - filed 10/17/2021: MOTION TO COMPEL THE COURT TO ORDER THE GRAND JURY TO RECONVENE AND REDELIBERATE PURSUANT TO NRS 172.241(5)

From page 5 of 7:

I is fundamentally unfair to I, the falsely accused, to be deprived of the remedy permitted in NRS 172.271(5) to testify to the grand jurors. This point is reinforced over and over again by virtue of the fact that the prosecutor committed material misconduct at the grand jury by assuming facts not in evidence and not revealing a mountain of exculpatory evidence to include the disclosure that my Property (Y.L.) was seriously damaged from the MRI contrast dye Gadavist. Nor did the grand jury jurors watch the discovery surveillance video of I carrying my lifeless son out of UMC Children's Hospital, the same son that was supposedly discharged in "good" condition which was a massively material lie by Dr. Chawla.

5th NOTICE - filed 1/10/2022 : REPLY TO STATE'S OPPOSITION TO DEFENDANTS' MOTION(S) IN LIMINE PURSUANT TO EDCR RULE 3.28

From page 5 of 7, paragraph 18 and part of paragraph 19:

18. *On page 23, lines 23 and 24, and 24, line 1, the prosecutor wrote:*

"As to Defendants' assertions about the Joint Declaration, the State has reviewed the document on multiple occasions and considered Defendants' claims therein; however, the State is not obligated to adopt Defendants' view of the facts."

19. **NOTICE TO THE COURT:** *Here we have the biggest admission of prosecutorial fraud. Instead of Ms. Jobe stating she assigned an independent investigator to investigate our "claims" (which is actually the truth, the whole truth, and nothing but the truth signed UNDER THE PENALTY OF PERJURY), we get insidiously asinine and immature drivel that amounts to, "we, the STATE, don't care what you have to say, we're going to concoct our own version of the events to suit our desire to convict at all costs". It has been stated repeatedly BCPD Slack did not conduct ANYTHING that resembled an investigation. **That alone warrants the DA's office to make its own independent investigation into the facts to include a medical expert that has NO ASSOCIATION WITH UMC CHILDREN'S HOSPITAL.***

6th NOTICE - filed 4/6/2022: MOTION TO RECONSIDER MOTION TO COMPEL THE COURT TO ORDER THE GRAND JURY TO RECONVENE AND REDELIBERATE PURSUANT TO NRS 172.241(5)

From page 2 of 5:

"AFFIDAVIT OF FACT"

87 pages total with 1 EXHIBIT. I filed this on 6/24/2021. If you want to understand what Gadavist is and what it does to humans with pictures, start on page 53 for some **EYE OPENING** information that has been **UNLAWFULLY IGNORED** by the prosecutor.

7th NOTICE - filed 6/17/2022: MOTION FOR DISCOVERY UNLAWFULLY WITHHELD BY chief deputy district attorney Michelle Jobe PURSUANT TO NRS 174.295

From page 4 of 9:

12. NOTICE TO THE HIGHER COURTS: *I have provided this court and the prosecutor, time and time again, the extensive and documented truth which explains WHY my son would appear abused or neglected due to the grossly incompetent doctors at UMC Children's Hospital. There is NO HISTORY whatsoever of any "habits" of child neglect/abuse on my part. That evidence simply doesn't exist. What does exist, however, are the UMC Children's Hospital records showing my son received an MRI contrast dye (Gadavist) so dangerous it carries an FDA "Black Box Warning" to "alert the public and health care providers to serious side effects, such as injury or death" (SOURCE: <https://www.drugwatch.com/fda/black-box-warnings/>). **NOT ONCE HAS Ms. Jobe EVER acknowledged this OBVIOUS ELEPHANT IN THE ROOM THAT EXPLAINS my son's compromised health maladies that were wrongfully and fraudulently blamed on me. NOT ONCE has Ms. Jobe ever stated in writing or in court that she had the investigator(s) of her so-called Special Victims' Unit ever look into this life threatening MRI contrast dye, nor has she tasked her investigator(s) to question UMC Children's Hospital doctors about the FACT that the hospital doctor(s) LIED about my son being released in "good" condition when he couldn't even walk or talk which has also been PROVEN by the hospital surveillance video obtained by BCPD Detective Slack.** IT IS BEYOND OUTRAGEOUS THAT MS. JOBE IS PERMITTED TO HARASS MY WIFE AND I FOR ALMOST 3 LONG YEARS WITH HER FRAUDULENT AND FRIVOLOUS AND MALICIOUS FRAME-UP OF A CASE. IT IS EQUALLY OUTRAGEOUS THAT EVERY JUDGE ASSIGNED TO THIS CASE HAS CONSPIRED WITH MS. JOBE TO FRAUDULENTLY PERPETUATE THIS CASE. This is a textbook example of criminal actors under the color of law that goes far beyond misconduct and fraud. AND IT'S ALL BEEN DOCUMENTED FOR THE RECORD which clearly SHOWS a criminally rogue RICO operation out of control.*

8th NOTICE - filed 8/11/2022: DEFENDANT'S MOTION TO CONTINUE TRIAL

From page 3 of 4:

MEMORANDUM OF POINTS AND AUTHORITIES

*There is a Good-Faith basis to file this Motion based upon the need for two (2) separate types of expert testimony in this case, specifically as to the side-effects of the drug Gadavist, and as to the effects of Autism. As of August 11, 2022, counsel for Mr. Sachs has been unable to engage any experts in conversation (after multiple attempts) as to their willingness and/or availability to testify in the upcoming jury trial in this case. There will also be an additional series of steps required (including paperwork) to get Clark County to approve said prospective expert(s) testimony. **This expert testimony is critical to Mr. Sachs' defense and the issues within this case are of an above-average level of complexity.***

9th NOTICE - filed 6/3/2023: ORDER FOR BEN NADIG

From the bottom of page 3 of 6 and the top of page 4 of 6, paragraph I:

*I, Kimball Austin Sachs, ORDER, you, Ben Nadig, to secure/obtain/retain/hire/ subpoena a **gadolinium** expert medical witness for my defense per my constitutionally guaranteed right under Amendment number 6. I sent you, Ben Nadig, an email entitled "Is there a reasonable reason to wait to line up a Gadolinium expert witness?" on May 31, 2023. As of today, June 3rd, 2023, you, Ben Nadig have not responded. This is unacceptable.*

10th NOTICE - filed 7/9/2023: MOTION TO REPRESENT MYSELF PURSUANT TO THE SIXTH AMENDMENT TO THE U.S. CONSTITUTION AND MOTION TO CONTINUE TRIAL PURSUANT TO THE NEVADA RULES OF PRACTICE FOR THE EIGHTH JUDICIAL DISTRICT COURT RULE 7.30

[TAKE NOTICE OF THE FACT THAT WHAT FOLLOWS IS AN EXTENSIVE RECORD OF MY UNFAILING ATTEMPTS TO GET FORMER COUNSEL BEN NADIG TO LOCATE/RETAIN A GADOLINIUM EXPERT TO NO AVAIL, HENCE WHY A CONTINUANCE WAS GRANTED. FROM MY PERSPECTIVE, THIS MOTION IS ESPECIALLY DAMNING AGAINST prosecutor Rinetti AS ANY REASONABLE MAN OR WOMAN CAN SEE/ UNDERSTAND HOW IMPORTANT/CRITICAL IT WAS TO LOCATE/ RETAIN THIS TYPE EXPERT WITNESS FOR MY DEFENSE WHICH SHOULD HAVE ALERTED THE prosecutor TO THE FACT SHE WAS POSITIVELY GOING TO HAVE TO ADEQUATELY PREPARE HER CASE ACCORDINGLY.]

From page 2 of 12 and 3 of 12:

GOOD CAUSE TO DISCHARGE MR. NADIG THAT LEADS TO THE INEVITABLE - THE TRIAL MUST BE CONTINUED

7. Mr. Nadig was assigned as my counsel on November 28, 2022. I made it crystal clear to Mr. Nadig this entire case was a massive frame-up to blame innocent parents for damages caused by the grossly incompetent doctors at the Las Vegas, NV, University Medical Center Children's Hospital from January 20-26, 2019.

8. Mr. Nadig subsequently ignored/disregarded EVERY SINGLE EMAIL/QUESTION posed to him about lining up/locating/hiring/retaining an expert medical witness to testify to the known dangers of gadolinium in Bayer Pharmaceuticals Gadavist MRI contrast dye administered to my son on January 26, 2019 which caused his immediate and obvious debilitating side effects that were falsely characterized as child neglect/abuse by the grossly incompetent Boulder City police detective Christopher Slack. My June 24, 2021, AFFIDAVIT OF FACT completely and thoroughly destroyed any/all credibility of the completely inept BCPD detective Slack which, to date, has gone unrebutted. In plain ENGLISH, this means BCPD detective Slack agrees, THROUGH HIS SILENT TACIT

ACQUIESCENCE, to EVERYTHING I have put forth/written/asserted/confirmed/attested to in my June 24, 2021, AFFIDAVIT OF FACT. For the record, judge Silva struck from the court record my court filings which included a NOTICE OF DEFAULT AND OPPORTUNITY TO CURE that was addressed to a number of guilty parties to include BCPD Slack, however, judge Silva HAD ZERO AUTHORITY TO STRIKE A PRO SE'S FILING, MINE, AS BEING, as what she falsely characterized as "rogue" filings. How does ANY reasonable man or woman KNOW this to be true? Does the Nevada Revised Statutes DEFINE a "rogue filing"? No. Does the statewide Nevada Rules of Criminal Procedure/Practice DEFINE a "rogue filing"? No. Does the Eighth Judicial District Court Rules DEFINE a "rogue filing"? No. What are you left with? A ROGUE JUDGE, THAT CALLS HERSELF judge Silva that makes up her OWN RULES IN COMPLETE DISREGARD TO ESTABLISHED NRS's, ESTABLISHED Nevada Rules of Criminal Procedure/Practice, and in complete disregard to the Eighth Judicial District Court Rules. IN OTHER WORDS a judge that does whatever she pleases in COMPLETE disregard to the existing rules/regulations/constitution. I CONTINUE to cite the rules/the rule of law and the Eighth Judicial District Court judges do whatever they want in complete denial of what is lawfully permitted. All of this has been documented for the RECORD.

9. On November 30, 2022, I sent Mr. Nadig a thorough and comprehensive email putting him on notice of the names/addresses/telephone numbers of the two firms I located that handle/provide gadolinium expert medical witnesses. I also made it clear to Mr. Nadig in this same email I was going to need this type medical expert for my defense as even the first court appointed counsel, Mike Anello, a former prosecutor from Florida, said I would need one. Former hired counsel, Gabriel Grasso, told me the same thing. SO, THE EMAIL RECORD SHOWS THAT I PROVIDED MR. NADIG A THOROUGH SYNOPSIS OF THE CASE AND DETAILS 2 DAYS AFTER HE WAS ASSIGNED TO MY CASE. THIS IS THE FOUNDATION UPON WHICH MY 'GOOD CAUSE' RESTS BECAUSE IN 7 MONTHS, AND 10 DAYS (222 DAYS AS OF TODAY, JULY 9, 2023) MR. NADIG DID NOTHING TO OBTAIN A GADOLINIUM EXPERT MEDICAL WITNESS that Mike Anello stated was "critical" to my defense in his previous court filing on record with this court.

From page 3 of 12 and 4 of 12:

10. On or about January 26, 2023, Mr. Nadig hired Ken Hardy of Silver State Investigations. My understanding from my telephone conversation with him on February 13, 2023, is that **he is a former Las Vegas police department detective**. Mr. Hardy told me over the phone that from his review of the case that my wife and I did not commit any crimes and that this case comes down to the "**belief system of care**" with the "**State**" "**abusing its authority**."

11. On March 28, 2023, Mr. Nadig wrote in an email to me, "How bout you and I just have a rational discussion?" After no less than my sending Mr. Nadig three follow up emails (March 30, 2023, April 2, 2023, April 3, 2023) to pin him down to a date/time, our 'rational discussion' NEVER happened. IN FACT, MR. NADIG HAS, IN 7 MONTHS AND 10 DAYS NEVER TALKED TO ME ONCE ON THE PHONE. THIS IS INEXCUSABLE GIVEN THE LEVEL OF COMPLEXITY INVOLVED IN THIS FRAME-UP OF A CASE.

12. On April 3, 2023, I sent an email to Mr. Nadig that stated in part:

"I'm going to need a gadolinium expert medical witness. This expert will be able to SHUT DOWN the da because the side effects of retained gadolinium perfectly match

Eason's debilitating physical symptoms that were pinned on my wife and I. Who's been working on finding/arranging/retaining this expert?"

AND

"And what effort, if any, was made to contact the 2 firms that I emailed previously that handle courtroom testimony regarding gadolinium?"

(REMEMBER, THIS INFORMATION WAS PROVIDED TO MR. NADIG 2 DAYS AFTER HE WAS ASSIGNED TO MY CASE, see paragraph number 9 above)

13. Mr. Nadig NEVER answered/responded to my legitimate questions. This constitutes INEFFECTIVE ASSISTANCE OF COUNSEL.

14. On April 5, 2023, I sent an email to Mr. Nadig that stated in part:

""I may have mentioned this before, but the 1st attorney assigned to me by the court was Mike Anello. He was a former prosecutor in Florida. He had ALL 5 star ratings. He was relieved from my case due to him taking a job as a prosecutor in northern Nevada.

On 8/11/2022, he filed for a continuance. I'm quoting the important part of his motion here (I've attached the motion for your convenience and the quote comes from page 6 of 7):

"There is a Good-Faith basis to file this Motion based upon the need for two (2) separate types of expert testimony in this case, specifically as to the side-effects of the drug Gadavist, and as to the effects of Autism. As of August 11, 2022, counsel for Mr. Sachs has been unable to engage any experts in conversation (after multiple attempts) as to their willingness and/or availability to testify in the upcoming jury trial in this case. There will also be an additional series of steps required (including paperwork) to get Clark County to approve said prospective expert(s) testimony. This expert testimony is critical to Mr. Sachs' defense and the issues within the case are of an above-average level of complexity."

When I previously emailed to you that I do NOT consent to going to a show trial without a gadolinium expert, I mean it.""

From page 4 of 12 and 5 of 12:

15. Mr. Nadig did not reply/respond to my very SPECIFIC April 5, 2023 email concern to obtain a gadolinium expert medical witness. This is more evidence/proof of Mr. Nadig being INEFFECTIVE ASSISTANCE OF COUNSEL.

16. On May 1, 2023, I sent Mr. Nadig an email that states in part:

"do we have an expert medical witness to testify about the known dangers of gadolinium?"

AND

*"I've made this statement before, but want to say this again..... **I do not consent to going to a show trial without a gadolinium expert. There is no way possible I could ever get a fair trial without this expert who can CONFIRM what I have said all along that has been ignored....gadolinium caused Eason's cachexia/weight loss/encephalopathy/stiffness of joints/muscles.** There are 3 peer reviewed medical journal articles (exhibits) in the JOINT DECLARATION that confirm the connection between gadolinium and these symptoms."*

17. Mr. Nadig NEVER replied/responded to my SPECIFIC question/concern of obtaining a gadolinium expert medical witness in no less than three follow up emails (May 2, 2023, May 3, 2023, May 4, 2023).

18. On May 25, 2023, I sent Mr. Nadig an email that states in part:

"I spoke with Ms. Leavy of MedExpertwitness this afternoon..... She confirmed over the phone today (and she did last year as well) that she can line up an expert medical witness for gadolinium. I asked her to reach out to both of you. Alternatively, I kindly ask that you reach out to her, sooner, rather than later because:

*August will be here before you know it (trial date)
You're going to have to file paperwork with the court ahead of time to get this expert "approved" and in turn, compensated/ready for trial"*

19. Mr. Nadig never replied/responded to my May 25, 2023 email.

20. On May 31, 2023, I sent Mr. Nadig an email entitled, "Is there a reasonable reason to wait to line up a Gadolinium expert medical witness?" which went on to state:

"There is no reasonable reason to delay your contacting either one or both of these firms to line up an expert medical witness to defend me"

AND

"Given the preceding, would you also like to "stack the deck of cards" in your favor by securing either one of these firms to testify on my behalf as to the known dangers of gadolinium in MRI contrast dyes?"

From page 5 of 12 and 6 of 12:

21. Mr. Nadig never replied/responded to my May 31, 2023 email.

22. On June 3, 2023, I sent Mr. Nadig an email that he never responded to my May 31, 2023 email. Later that day, Mr. Nadig wrote:

"Is there something we have talked about that I am not doing?"

23. Mr. Nadig's response is an interesting confession in and of itself. A court appointed attorney asking me "is there something we have talked about that I am not doing?" Yes. It's called representing your client zealously and responding to written communications in a timely and professional manner.

24. On June 3, 2023, I sent Mr. Nadig an email that states in part:

"Yes, there is something you have not done. You have not talked to me once. You have not responded to this email about obtaining a gadolinium expert."

25. Later that day, Mr. Nadig sent me an email that states in part:

"Lol, your order is going to be denied. But I have no problem filing the motion."

26. So, "Lol" stands for laughing out loud. Is THIS a laughing matter? Yes, it is to Mr. Nadig. I sent Mr. Nadig a LAWFUL ORDER. Is his response professional? NO. Is his response in line with his duties to act in a responsible manner consistent with the American Bar Association or even Nevada Rules of Criminal Practice/Procedure? No.

27. Mr. Nadig went on to say in his June 3, 2023 email in part:

"But I have no problem filing the motion."

Mr. Nadig's response is confusing because my June 3, 2023 ORDER included a request to file two separate motions; a MOTION TO DISMISS FELONY COUNT 3 DUE TO DESTRUCTION OF EVIDENCE PURSUANT TO NRS 199.220 and a MOTION TO HAVE THE GRAND JURY RECONVENE PURSUANT TO NRS 172.241(5).

28. As Mr. Nadig never responded, it is unclear which motion he has "no problem filing". This is unacceptable.

29. On June 4, 2023, I sent Mr. Nadig an email that stated in part:

"Also, would like to check in with you on when you're going to line up a gadolinium expert? Isn't it as easy as your asking Ken Hardy to make this happen?"

30. Mr. Nadig never replied/respond to my June 4, 2023 email.

31. On June 6, 2023, I sent Mr. Nadig an email that stated in part:

"Following up on the question below that hasn't been addressed, thanks.

When do you plan to locate/obtain/retain a gadolinium expert?"

From page 6 of 12 to 7 of 12:

32. Mr. Nadig never replied/responded to my June 6, 2023 email.

33. On June 7, 2023, I sent Mr. Nadig an email that stated:

"Following up to the question below, thanks."

"When do you plan to locate/obtain/retain a gadolinium expert?"

35. On June 8, 2023, I sent Mr. Nadig an email that states in part:

"also the question as to when you're going to start to line up a gadolinium expert. This last question is something you've avoided answering many times which on one level is not understandable and on another level is unreasonable."

36. On this same day, June 8, 2023, Mr. Nadig responded by saying:

"You have to realize that I do things at my speed. There's no need for me to do things on a timeline you set, I know what I'm doing, I know when to do it. You're going to have to trust in that. You can file order after order and it still won't change my timeline."

37. Mr. Nadig's response above is proof positive of his arrogance that he, somehow, has control over expert witnesses and their workload/caseload and that they, can, at a moment's notice, drop what they're doing to accommodate Mr. Nadig's requirements to testify in time for a mid-August trial. This is plainly and obviously ridiculous not to mention brazen fraud as Mr. Nadig has not only a contractual duty but sworn duty to represent me zealously. Mr. Nadig's response above is also proof positive of his willful and wanton disregard for lawful client ORDERS.

From page 7 of 12 and 8 of 12:

40. On June 8, 2023, I sent Mr. Nadig an email which states in part:

"1) You agree with me in writing that you are going to timely line up a gadolinium expert (you and Ken were already sent/emailed the names of 2 firms that stated in writing, they can provide this type expert medical witness)?

2) You agree with me in writing that you are going to timely file a motion to have count 3 dropped for destruction of evidence? (You stated in previous email you had no problem filing "the motion", however, your response was ambiguous with respect to which motion you'd be filing as I asked for more than one motion in the 6/3/2023 ORDER)

3) You agree with me in writing to timely file a motion in limine to have any/all mention of the false positive claim of THC in Eason's body suppressed at trial?

4) You agree with me in writing that you will impeach Chensia Grayson at any forthcoming "show" trial for perjury (she stated I was "removed from the facility" meaning UMC Children's Hospital at the grand jury which was a brazen lie)?

5) Based on 1 and 2 and 3 above, you agree with me that none one of these actions are going to reasonably delay the currently scheduled August trial date?

For each one above, please simply state "Yes/Yay" or "No/Nay"."

41. Mr. Nadig never responded/replied to my June 8, 2023 email. His non-responses are now evidence of a clear pattern of his being INEFFECTIVE ASSISTANCE OF COUNSEL. Also, this court is directed to take special notice of number 5 immediately above which shows/proves I have been proactive in my attempts to keep Mr. Nadig "on track" so to speak to be prepared for the August trial of which he has been completely non-responsive.

42. On June 13, 2023, I sent Mr. Nadig an email which states in part:

"The weakness in your assurance revolves around the fact you don't know, at this point, because you haven't already lined up an expert on gadolinium (and obtained approval from the court) is how long will it take them to review Eason's medical records and how long they would require timewise before they're ready to testify? How do you account for this X factor"

43. Mr. Nadig never replied/responded to my June 13, 2023 email.

44. On June 17, 2023, I sent Mr. Nadig an email (with respect to my June 13, 2023 email, above) which states:

"1st follow up to my June 13th email to you (immediately below).

Please address this issue/question in a reasonable amount of time. Thank you."

45. On June 21, 2023, I sent Mr. Nadig an email (with respect to my June 13, 2023 email, above) which states:

"2nd follow up to my June 13th email to you (below).

I kindly ask for you to address this issue/question as a reasonable amount of time has passed. Thank you."

From page 8 of 12 and 9 of 12:

46. On June 22, 2023, I sent Mr. Nadig an email (with respect to my June 13, 2023 email, above) which states:

"3rd follow up to my June 13th email to you (below).

I called and left a phone message for you yesterday, fyi. Instead of addressing my 2nd follow up, you sent me an email fairly quickly if I was aware the cases were going to be severed, which I responded to.

Ben, my written correspondence shows you have evaded/dodged this question probably at least 10 times. A gadolinium expert will put to rest any doubts the jurors may have about the damages caused to my son. *I've stated this many times, in many different ways, it PERFECTLY explains my son's cachexia/weight loss/encephalopathy/stiffness of joints/muscles. If I was a juror and heard that, it would confirm in my mind the parent is not to blame. My position is, this AIN'T rocket science. The mid-August show trial date is just around the corner. Why haven't you contacted Ken Hardy to line up a gadolinium expert? I kindly ask for your written response to this sensitive issue by close of business today, Thursday, June 22nd, 2023.*

Thank you."

47. Mr. Nadig never responded/replied to any of my follow up emails (June 17, 2023, June 21, 2023, June 22, 2023).

48. On June 23, 2023, I sent Mr. Nadig an email which states in part:

"It is my duty to inform you that you have failed to address/respond timely/reply to numerous written requests to answer a simple question. And what is that simple question? What have you done in all these months to line up an expert medical witness regarding the known dangers of gadolinium that jacked up my son?"

AND

"And how could you possibly KNOW for sure, by waiting at the last possible moment, that some firm that specializes in providing expert medical witnesses for gadolinium will meet YOUR timeline/deadline?"

AND

"I'm giving you a second chance and final chance to respond by close of business tomorrow, Friday, June 23, 2023."

49. Mr. Nadig never responded by close of business June 23, 2023.

50. On June 28, 2023, I sent Mr. Nadig an email which states in part:

"As I stated in my previous email, you've dodged answering a recurring question about lining up a gadolinium expert at least ten times. You failed to honor everything in my direct ORDER to you. You have a DUTY to be my assistance of counsel. The moment you failed to fulfill that role you breached your duties of which I now have extensive documentation. Please do the honorable thing at this point and submit your motion to withdraw as my counsel as I am now exercising my Constitutional right to re-present myself. Other than your hiring Ken Hardy, you have accomplished nothing in 8 or so months. You are ineffective assistance of counsel. My request is non negotiable. Time is of the essence. I require a written response by close of business tomorrow."

From page 9 of 12:

52. On July 3, 2023, I sent Mr. Nadig the following email:

"Mr. Nadig,

I take issue with just about everything you said. Putting that aside, please file a motion asap to continue the trial. I'm in the middle of a move and don't have access to a computer. Once I do, I'll do the paperwork to fire you to represent myself.

The justification for the continuance would be that you failed to get a gadolinium expert and that after you're relieved, I'll need adequate time to line up that expert myself.

Please acknowledge receipt of this email in 1 business day from today, July 2nd, 2023, and your intentions to comply.

Thank you.

Mr. Sachs"

53. Mr. Nadig never replied/responded to my July 3, 2023 email.

From page 11 of 12:

CONCLUSION

64. I, Kimball Austin Sachs, move this court to grant me my sixth amendment guaranteed constitutionally protected right to represent myself devoid of court appointed assistance of counsel and **I, Kimball Austin Sachs, move the court to grant me a continuation of the trial sufficient that in such time I may contact/hire through the court, at the court's expense/retain a gadolinium expert at the court's expense, in my defense per my sixth amendment rights to a fair trial without further ado.**

11th NOTICE - filed 8/13/2023: MOTION TO CORRECT THE RECORDER'S TRANSCRIPT OF THE HEARING HELD ON JULY 24, 2023, PURSUANT TO NRS 656.250 AND MOTION TO DISMISS CHARGES AS THE COURT IS DEPRIVED OF IN PERSONAM JURISDICTION PURSUANT TO THE CONTRACT CLAUSE OF THE UNITED STATES CONSTITUTION

[TAKE NOTICE OF THE FACT THAT prosecutor Rinetti, BY THIS POINT, HAD RECENTLY TAKEN OVER THIS FRAME-UP OF A CASE]

From page 11 of 25:

65. "you're not just allowed to ask each other things".

THAT COULD NOT POSSIBLY BE TRUE. I sent former prosecutor Ms. Jobe a LOT of emails and SHE, IN FACT, DID RESPOND TO ME IN WRITING VIA EMAIL. **Conversely, judge Kierny, please state/cite the SPECIFIC AUTHORITY for the record which prohibits me, the natural man, from asking direct questions to a PUBLIC SERVANT called the chief deputy district attorney?** Since when does a PUBLIC SERVANT get to "hide" behind you/the court? This is not only ABSURD, IT IS RIDICULOUS and VIOLATES MY DUE PROCESS RIGHTS. **Ms. Rinetti, like Ms. Jobe has a DUTY to prosecute the guilty and to clear the innocent.** It is my belief that Ms. Rinetti has NOT read the 195 page JOINT DECLARATION OF KIMBALL AUSTIN SACHS AND YUXIA ZHANG which included no less than 90 EXHIBITS and I also believe you, judge Kierny, have NOT read this court filing either. If you did, you would REALIZE the obvious fraud that you continue to perpetuate which **SHALL have consequences.** The other court filing that I believe neither you judge Kierny nor prosecutor Rinetti have read is my June 24, 2021 AFFIDAVIT OF FACT which included a 35 page EXHIBIT A explaining in great detail just how dangerous gadolinium is and what it did to my son. You BOTH have a DUTY to read these court filings in their entirety. And, Ms. Rinetti has an **ADDITIONAL DUTY** to assign one of the investigators in her department to research the valid/truthfulness of the claims I have made regarding the KNOWN DANGERS of gadolinium and how it debilitated my son to point of making the grossly negligent police detective Christopher Slack believe that my wife and I somehow caused our son's maladies. **THIS IS GETTING REAL OLD AS IN,** I KEEP REPEATING THE SAME PLEA, FOR YOU SO-CALLED PUBLIC OFFICIALS TO DO YOUR JOB/ YOUR DUTY AND TO STOP HARASSING MY WIFE AND I. THE ONLY REASON MS JOBE GOT HER INDICTMENT IS BECAUSE SHE COMMITTED REPEATED FRAUD AND PROSECUTORIAL MISCONDUCT AND BECAUSE THE GRAND JURY JURORS DID NOT HEAR OUR SIDE OF THE "STORY" WHICH UNLIKE MS. JOBE'S FRAUDULENT TACTICS, IS THE TRUTH, THE WHOLE TRUTH, AND NOTHING BUT THE TRUTH. And based on the foregoing, I put judge Kierny and Ms. Rinetti on **NOTICE**, you both have a clear **DUTY** to read **ALL** of my court filings to include the ones regarding Ms. Jobe's brazen fraud committed at the grand jury and to **REPORT HER TO THE PROPER AUTHORITIES (NOTE: judge Kierny, you have this SPECIFIC DUTY under JUDICIAL CANON Rule 2.15. Responding to Judicial and Lawyer Misconduct).** Failing that, you both SHALL be held accountable for protecting a rogue prosecutor that REPEATEDLY violated many Nevada laws/statutes and her oath and my constitutional rights.

From page 15 of 25:

81. If judge Kierny TRULY had a "commitment to public service" she'd read my most important court filings as previously stated in this motion. I'm going to state this ONCE AGAIN, for the public record judge Kierny:

My wife and I have been **FRAMED** for non-existent child neglect/abuse charges DIRECTLY caused by the grossly negligent doctors at UMC Children's Hospital from January 20-26, 2019. The gadolinium in the MRI contrast dye caused my son's

cachexia, encephalopathy, weight loss and stiffness of his joint/muscles. My son was NOT released in "good" condition from UMC Children's Hospital. This is SO OBVIOUS that ANY reasonable man or woman can SEE from the surveillance video that is part of the discovery that this fact cannot be dismissed. Since my son was NOT released in "good" condition, it follows that he was released in a damaged/compromised condition as CONFIRMED by the hospital surveillance video. What did we do as caring and loving parents? We provided what the fictitious State of Nevada calls non-medical remedial care under NRS 200.5085. We spent over \$1,100 of our own DOCUMENTED funds to help SAFELY heal our son. Does Ms. Rinetti have any evidence/proof to show otherwise? Of course she doesn't. Based on the foregoing, one of the questions that shall be posed to Ms. Rinetti, the grossly **evasive** PUBLIC SERVANT that she is, is what evidence or what competent fact witnesses do you have to show/prove **beyond a reasonable doubt** that the parents actually inflicted/caused Y.L.'s child abuse/neglect?

12th NOTICE - filed 12/10/2023: MOTION TO REQUEST STANDBY COUNSEL PURSUANT TO JUDGE CARLI KIERNY'S VERBAL OFFER MADE DURING THE JULY 24, 2023 HEARING

From page 3 of 9, paragraph k and **excerpts** from the "NOTE"(s):

k. provide an investigative role to **specifically** locate/identify/contact/retain/subpoena an expert medical witness on the known dangers of **gadolinium/retained gadolinium and anti-seizure pharmaceutical chemicals** (the same ones administered to my son against my consent - **depacon/valproate, ativan/lorazepam, fosphenytoin/cerebyx, keppra/levetiracetam**)

NOTE: See ATTACHMENT 1 entitled "**2 Gadolinium expert medical witnesses firms**" to be used IMMEDIATELY by court appointed standby counsel to obtain a gadolinium expert medical witness ahead of the scheduled March 4, 2024 trial date. It is quite clear from Michael Anello (he was the first court appointed counsel to me who was also a former prosecutor in Florida) that I shall REQUIRE at least two (2) separate and distinct types of expert medical witnesses.

NOTE: As a reminder, the second court appointed counsel, Roger Bailey, never contacted me once and wasted over a month and was replaced by Ben Nadig. AGAIN, Ben Nadig wasted over 8 months and NEVER attempted to contact a gadolinium expert despite my REPEATED and DOCUMENTED attempts for him to do so. Suffice to say, I do NOT consent to going to any contrived show trial unless and until I have two (2) separate and distinct expert medical witnesses to testify on my behalf.

13th NOTICE filed December 18, 2023: OBJECTION TO judge Kierny's AUGUST 28, 2023 FRAUDULENT HEARING

From page 5 of 13 and 6 of 13:

Sachs: "I'm going to say this for the record, I have been framed, how hard is it for you to understand ma'am? I have been framed and so is my wife. Now, how do we know that we've been framed? Because detective Slack never conducted anything that resembled an investigation. How do we know that? Because I did an extensive affidavit that dissected every one of the lies he put forth in his affidavit and that's on the record and it's really your responsibility to read that. I don't think that you've read it, I wish you would have read it, but I don't even know it makes any difference that you would have

*read it because you're just doing what you want anyway and so the other part of this is our boy was never released from UMC children's hospital in good condition. How do we know that to be true? Because detective Slack provided the surveillance video that shows me, the daddy, carrying a broken boy out of the hospital and it is absolutely remarkable not you and not **Ms.**,ah, **Rinetti**, or Ms. Jobe or even detective Slack wants to scratch their head and say, wow, that's interesting, so the medical records from the hospital from the doctors that lie and say he was released in good condition, how could he be? We have video that shows otherwise. And so, because he was not released in a good condition it follows that he was released in a damaged condition. What did my wife and I do over the next 7 days? We spent \$1,100 dollars to heal him with safe and effective remedies that included a Myers Cocktail VI and so you and **Ms. Rinetti**, Ms. Jobe all just sit there like, like you're just clueless wonders, like you can't piece this together, like, like, I'm gonna ask the question ma'am, I guess I don't mean any*

*disrespect, but **I'm asking the question, are you all retarded? I mean I really have to ask the question, are you mentally retarded?"***

[THE ANSWER TO THAT QUESTION IS SELF- EVIDENT TO ALL REASONABLE MEN AND WOMEN. THE PROSECUTOR SEEMS TO THINK IT'S PERFECTLY OKAY TO SCREW WITH INNOCENT PARENTS. THE PROSECUTOR APPEARS TO THINK THAT HOSPITAL DOCTORS ARE INCAPABLE OF INJURING A PATIENT. EXHIBIT 14 FROM THE 1/27/2020 JOINT DECLARATION MAKES IT CLEAR, "During the period 2008-2015, more than 1,000 lawsuits were filed against the manufacturers of Gadolinium-Based Contrast Agents(GBCA)." Are reasonable men and women to believe the Levin Papantonio Law Firm made that up out of thin air? NO! IF NOT, WHAT DOES THIS MEAN IN PLAIN ENGLISH THAT CONVENIENTLY ESCAPES THE PROSECUTOR FOR YEARS ON END? THAT GADOLINIUM HAS A PROVEN TRACK RECORD OF BEING DANGEROUS AND ALSO JUSTIFIES THE REASON WHY IT CARRIES THE FDA'S MOST STRINGENT WARNING THERE IS, THAT OF THE "BLACK BOX WARNING". IT

IS THE HEIGHT OF BRAZEN

PROSECUTORIAL MISCONDUCT FOR prosecutor Rinetti TO HAVE SHIRKED HER DUTY IN LIGHT OF ALL THE FACTS PRESENTED TO THE COURT ALL THESE YEARS TO FAIL TO LINE UP/OBTAIN/HIRE HER OWN

GADOLINIUM REBUTTAL WITNESS! IS THIS COURT GOING TO REWARD SUCH PROSECUTORIAL MISCONDUCT?]

14th NOTICE - filed 4/15/2024: EMERGENCY JOINT MOTION TO CHANGE VENUE UNDER NRAP 27(e)

[NOTE: Before this was filed with the Nevada Supreme Court, it was filed with the district court.]

From page 7 of 11:

15. In a related case, *The State's* assertion that the prosecution "bears no burden with regard to the finding of mitigating circumstances or the weighing process" is not only irrelevant, for the reasons explained above, but is refuted by the decisions of the Nevada Supreme Court', *Floyd v. State*, 42 P. d3 249 - Nev: Supreme Court 2002. Clearly, in this case, the State (Michelle Jobe and **Dena Rinetti**) had a duty to investigate the truthful claims made by the petitioners (reference especially the JOINT DECLARATION (S#15-19) and AFFIDAVIT OF FACT (Z#55 and S#69)) under the penalty of perjury that Y.L. was severely damaged by the MRI contrast dye, Gadavist, which contained element number 64, gadolinium, that was directly responsible for Y.L.'s maladies.

15th NOTICE - filed 5/9/2024: MOTION TO STRIKE Dena Dinette's FRAUDULENT AND UNTIMELY STATE'S OPPOSITION TO DEFENDANTS' MOTION TO DISMISS WITH PREJUDICE FOR BRAZEN FRAUD ON THE PART OF BCPD SGT CHRISTOPHER SLACK AND CHIEF DEPUTY DISTRICT ATTORNEY DENA RINETTI

From page 4 of 48 and 5 of 48:

16. *Dena Rinetti* has committed the following violations to the NEVADA RULES OF PROFESSIONAL CONDUCT:

COMMENT:

Dena Rinetti is also in clear violation of Rule 3.8(d) as she and former prosecutor Michelle Jobe have REFUSED to investigate the truthful claims made in the JOINT DECLARATION OF KIMBALL AUSTIN SACHS AND YUXIA ZHANG (see SACHS docket numbers #15 through #19) and the AFFIDAVIT OF FACT (see SACHS docket number #69 and ZHANG docket number #55) which disclosed the known dangers of retained gadolinium from the January 26, 2019, MRI for Yichen Liu which perfectly explained his physical symptoms of weight loss, encephalopathy, and cachexia. When a prosecutor fails to investigate such matters at the request of opposing counsel, this is prima facie evidence of malfeasance and misconduct and breach of duty and perjury of oath. Both Michelle Jobe and Dena Rinetti stand in DISHONOR with FILTHY HANDS for their unforgivable shenanigans which shall not go unchallenged.

From page 6 of 48:

20. It is noted, even if Dena Rinetti's OPPOSITION were filed timely, it could not be taken seriously as she failed to cite any specific authority for each ground thereof in direct violation of sub-rule number, 6 to the Nevada Rules of Criminal Practice, Rule 8., Pretrial Motions, cited/ stated in paragraph number 4. **It appears Dena Rinetti lives in some fantasy world that is in COMPLETE DENIAL of the VAST AND EXTENSIVE RECORD based upon court filings of the defendant through its undersigned Attorney-in-fact that are CONSISTENTLY signed under the penalty of perjury.** What sacrifice has Dena Rinetti made? None. Are her statements/claims verified? No. What are you left with? A whole lot of NOTHING except the continuation of her and

*Michelle Jobe's BIG AND FRAUDULENT BLUFF to falsely accuse innocent parents. **It's worth repeating here that Dena Rinetti and Michelle Jobe both REFUSED to investigate the truthful claims of the defendant through its undersigned Attorney-in-fact to the known dangers of gadolinium which perfectly explained the outward physical symptoms of Yichen Liu. This IS prima facie evidence of prosecutorial misconduct which shall not go unchallenged.***

16th NOTICE - filed 7/16/2024: EMERGENCY MOTION TO REQUEST STANDBY COUNSEL PURSUANT TO JUDGE CARLI KIERNY'S VERBAL OFFER MADE DURING THE JULY 24, 2023 HEARING

Reference page 3 of 44, paragraph k and excerpts from the "NOTE"(s) on pages 3 and 4:

k. provide an investigative role to **specifically** locate/identify/contact/retain/subpoena an expert medical witness on the known dangers of **gadolinium/retained gadolinium and anti-seizure pharmaceutical chemicals** (the same ones administered to my son against my consent - **depacon/valproate, ativan/lorazepam, fosphenytoin/cerebyx, keppra/levetiracetam**)

NOTE: See ATTACHMENT 1 entitled "**2 Gadolinium expert medical witnesses firms**" to be used IMMEDIATELY by court appointed standby counsel to obtain a gadolinium expert medical witness ahead of the scheduled August 19, 2024 trial date. It is quite clear from Michael Anello (he was the first court appointed counsel to me who was also a former prosecutor in Florida) that I shall REQUIRE at least two (2) separate and distinct types of expert medical witnesses.

NOTE: As a reminder, the second court appointed counsel, Roger Bailey, never contacted me once and wasted over a month and was replaced by Ben Nadig. AGAIN, Ben Nadig wasted over 8 months and NEVER attempted to contact a gadolinium expert despite my REPEATED and DOCUMENTED attempts for him to do so. **Suffice to say, I do NOT consent to going to any contrived show trial unless and until I have two (2) separate and distinct expert medical witnesses to testify on my behalf.**

17th NOTICE - filed 8/12/2024: MOTION AND COMPLAINT TO DISQUALIFY prosecutor Dena Rinetti FOR GROSS MISCONDUCT AND NONFEASANCE PURSUANT TO THE NEVADA RULES OF PROFESSIONAL CONDUCT RULE 3.8 AND THE NEVADA CODE OF JUDICIAL CONDUCT RULE 2.15 AND NRS 283.440 REMOVAL OF CERTAIN PUBLIC OFFICERS FOR MALFEASANCE OR NONFEASANCE

[TAKE NOTICE OF THE FACT THAT GADOLINIUM DEPOSITION DISEASE (GDD), SYNONYMOUS WITH GADOLINIUM DEPOSITION DISORDER, WAS RAISED NOT ONCE, BUT TWICE IN THIS MOTION THAT WAS DIRECTED AT prosecutor Rinetti WHO CONTINUED TO REMAIN WILLFULLY AND WANTONLY OBLIVIOUS TO HER DUTY TO LINE UP, PRIOR TO TRIAL, THE CORRECT/QUALIFIED GADOLINIUM REBUTTAL WITNESS. DOES THIS INFORMATION NEED TO BE TATTOOED TO HER PERSON FOR HER TO "GET IT"?]

From page 1 of 53:

1. This "MOTION AND COMPLAINT TO DISQUALIFY prosecutor Dena Rinetti FOR GROSS MISCONDUCT AND NONFEASANCE PURSUANT TO THE NEVADA RULES OF PROFESSIONAL CONDUCT RULE 3.8 AND THE NEVADA CODE OF JUDICIAL CONDUCT RULE 2.15 AND NRS 283.440 REMOVAL OF CERTAIN PUBLIC OFFICERS FOR MALFEASANCE OR NONFEASANCE" is being filed in response to prosecutor Dena Rinetti's willful and wanton **refusal** to answer the question during the August 6, 2024, hearing as to why she has not tasked one of her on-staff investigators to investigate the truthful claims made in the court filed "JOINT DECLARATION OF KIMBALL AUSTIN SACHS AND YUXIA ZHANG" regarding the **irrefutable fact** that UMC Children's Hospital doctors injured my son with their use of the MRI contrast dye Gadavist containing element number 64, gadolinium.

From page 1 of 53 and 2 of 53:

BACKGROUND

3. On January 27, 2020, James Smith, paid counsel for the defendant at the time, filed an incomplete copy (due to his gross incompetence) of the "JOINT DECLARATION OF KIMBALL AUSTIN SACHS AND YUXIA ZHANG" attached hereto as **EXHIBIT 1**. A complete copy was subsequently filed by the defendant through its undersigned Attorney-in-fact. This 195 page declaration with 90 EXHIBITS spelled out EXACTLY what happened to my son at UMC Children's Hospital under the penalty of perjury. As has been written what seems like countless times to the **intentionally deaf ears** of the district court judges and prosecutors is this:

Eason, aka Yichen Liu was poisoned by the UMC Children's Hospital doctors with gadolinium. The peer reviewed medical journal article **EXHIBITS** in the JOINT DECLARATION proved there was an **irrefutable connection** between gadolinium and cachexia, encephalopathy, weight loss, and stiffness of joints and muscles. Furthermore, the grossly inept police detective, BCPD Slack, never conducted anything resembling an investigation. This same detective obtained the hospital surveillance video showing Eason being carried out of the children's hospital looking like a zombie. The children's hospital doctors lied that Eason was discharged in "good" condition and was moving "all four limbs".

4. What is painfully OBVIOUS now after all these years is the "actors" in this district court (prosecutors/judges) are de facto **agents** for UMC Children's Hospital business and economic interests, are you not? And that would be in direct violation of NRS 281A.020 would it not? What does this NRS say? The relevant part states:

NRS 281A.020 Legislative findings and declarations regarding "**Ethics in Government**"

1. It is hereby declared to be the public policy of this State that:

(a) **A public office is a public trust and shall be held for the sole benefit of the people.**

(b) **A public officer or employee must commit himself or herself to avoid conflicts between the private interests of the public officer or employee and those of the general public whom the public officer or employee serves.**

Unless and until the defendant, through its undersigned Attorney-in-fact, is in receipt of

notarized affidavits signed under the penalty of perjury to the contrary, the “actors” in this district court (prosecutors/judges) are, in fact, de facto **agents** for UMC Children’s Hospital business and economic interests and this claim STANDS AS TRUTH IN COMMERCE. Or, put another way, EVERYTHING going on with this for-profit corporation masquerading as a public court doing business as the Eighth Judicial District

Court is a fraudulent scam, is it not? **It’s no wonder there has been no justice that has been administered in this obvious frame-up after five (5) years.**

It’s obvious to all reasonable men and women what has transpired here, is it not?

From page 6 of 53:

Nevada Rules of Professional Conduct, Rule 3.8., **Special Responsibilities** of a Prosecutor. The prosecutor in a criminal case **shall**:

(d) **Make timely disclosure to the defense of all evidence or information known to the prosecutor that tends to negate the guilt of the accused or mitigates the offense**

It looks like you, Dena Rinetti, **conveniently forgot** that word “**shall**”, does it not? And what does that mean? It’s the imperative, as in, you have NO CHOICE. It’s non-discretionary. So, your willful and wanton **REFUSAL** to task your on-staff investigators to look into Eason being poisoned by gadolinium by the UMC Children’s Hospital doctors is in COMPLETE VIOLATION of your non-discretionary DUTY to “negate the guilt of the accused or mitigates the offense”, is it not? The answer is self evident to ALL who do

NOT have an “agenda” to unlawfully/illegally pervert justice, is it not? **What do you, Dena Rinetti, KNOW about Gadolinium Deposition Disease (GDD)?**

What do you, Dena Rinetti, **KNOW** about iatrogenic gadolinium poisoning? RIGHT! EXACTLY! NOTHING! Because you DON’T WANT TO KNOW! A prosecutor who cannot SEE and readily admit their mistakes even when it PLASTERED RIGHT IN FRONT OF THEM has NO BUSINESS being a prosecutor! This means YOU, Dena Rinetti! You NEED to recuse yourself stat!

Do you REALLY think or believe the JURY is not going to come to learn of not only **Gadolinium Deposition Disease** but also iatrogenic gadolinium poisoning and how it severely injured my son? The RECORD before this court clearly shows/proves YOU and Jobe have done your **VERY BEST** to never investigate these matters in spite of the fact you both had a **NON-DISCRETIONARY DUTY TO DO SO** when

prompted many times in court filings and by email correspondence.

From the "NOTE" on page 7 of 53:

"NOTE: Might the **irrefutable evidence** of gadolinium poisoning "exonerate the accused"? Of course it would. Isn't that the EXACT reason why you, Dena Rinetti and your "buddy" Michelle Jobe, have never investigated these obvious facts? The OBVIOUS answer to all reasonable men and women is a RESOUNDING YES."

18th NOTICE - Email correspondence with prosecutor Rinetti with subject, "Request for telephonic meeting...." (**SEE EXHIBIT B**)

Tue, Aug 1, 2023 at 8:16 PM

Ms. Rinetti,

My wife and I are requesting to speak to you directly on the phone at your earliest convenience regarding our cases (C-19-343540-1 & C-19-343540-2).

Please provide a date and time (Pacific Daylight Time) that we may call you directly and for you, obviously, to provide your direct telephone number.

Thank you.

Mr. Sachs and Ms. Zhang

Fri, Aug 4, 2023 at 10:00 AM

Following up, thank you.

Fri, Aug 11, 2023 at 12:37 AM

Following up for the SECOND TIME. Thank you.

Dena Rinetti <Dena.Rinetti@clarkcountyda.com>

Mon, Aug 14, 2023 at 5:40 PM

I am happy to discuss the case with you via email.

Mon, Aug 14, 2023 at 7:14 PM

Ms. Rinetti,

Thank you for your offer.

A few questions....

1) Have you read our 195 page JOINT DECLARATION OF KIMBALL AUSTIN SACHS AND YUXIA ZHANG with 90 EXHIBITS in its entirety? If not, why not?

*2) If yes, **have you assigned one of your investigators to investigate the truthful claims we made regarding the dangers of the gadolinium (element #64) in the MRI contrast dye our son was clearly debilitated by?** If not, why not?*

3) Have you read my 6/24/2021 AFFIDAVIT OF FACT in its entirety to include the 35 page EXHIBIT A that covers in great detail the known dangers of gadolinium? If not, why not?

- 4) Do you understand that the video surveillance that detective Slack obtained from UMC Children's Hospital and is part of the provided discovery, clearly shows our son was not released in "good" condition as the lying doctors put on our son's medical records? If not, why not?
- 5) Do you understand that detective Slack never conducted anything that even remotely resembled a respectable "investigation" of the facts (reference the 6/24/2021 AFFIDAVIT)? If not, why not?
- 6) Do you understand that Ms. Jobe committed serious prosecutorial misconduct (not revealing even a fraction of the exculpatory evidence that existed, assuming facts not evidence, allowing perjured testimony) at the September 2019 grand jury that was carefully documented in my 6/24/2021 AFFIDAVIT? Do you further understand that, to date, Ms. Jobe has not rebutted (under penalty of perjury) what I've stated under penalty of perjury, therefore by her silent tacit acquiescence, she agrees that she has, in fact committed prosecutorial misconduct? Do you further understand by virtue of the OPPOSITION you filed this morning by quoting her fraudulent grand jury testimony that you are aiding and abetting in Ms. Jobe's fraud and that you shall be held accountable just as she will? If not, why not?
- 7) Do you understand that you have no competent fact witnesses to any child neglect/abuse? If not, why not?
- 8) Do you understand regarding count 1 that you have no competent fact witnesses to prove anything beyond a reasonable doubt? If not, why not?
- 9) Do you understand regarding count 2 that there isn't a single NRS that dictates parents MUST bow down to/submit to the dictates of western doctors that know nothing about healing nor did we have to give our son the chemical poisons they said we had to? If not, why not?
- 10) Do you understand that western doctors are only trained to "treat symptoms" with chemicals they call drugs that include a lot of side effects, some life threatening? If not, why not?
- 11) Do you understand that NRS 126.036 and NRS 200.5085 and the 2 Nevada NRS's regarding informed consent negate any/all of the false charges that you maintain against my wife and I? If not, why not?
- 12) Do you understand regarding count 3 that it isn't against the law to leave your son safely at home to pay the bail bondsman? Do you further understand there are only, currently, 3 U.S. states that SPECIFICALLY prohibit parents from leaving their child at home, Maryland, Oregon, and Illinois? Do you further understand per the equal protection clause of the constitution that we cannot be held to imaginary crimes that don't even exist in Nevada? If not, why not?
- 13) Where is the evidence on the existing court record here and now, and not theoretically, that you have provided this color of law corporation doing business as the Eighth Judicial District Court factual evidence it has in personam jurisdiction over me, the natural man?
- 14) Do you understand the NRS's you cited in your OPPOSITION this morning make reference to a "person"? Do you understand that I don't consent to being a "person"? Do you understand that I don't agree to be a "person"? Do you understand it is against my will to be called a "person"? Do you understand that I shall put on the record that I rebut any and all presumptions that I am a "person"?
- 15) Please fully disclose, under penalty of perjury in the form of an Affidavit that is notarized, what is your financial interest in this case?
- 16) Do you understand that I am keeping arguably one of the most detailed accounts/records of all the fraud that everyone in this case has committed including yourself? If not, why not?
- 17) Do you understand with zero competent fact witnesses you have zero chances of proving ANYTHING beyond a reasonable doubt to 12 jurors? If not, why not?

18) Do you understand that my wife and I love our son and did everything we could to SAVE his life in SPITE of western doctors that throw dangerous chemicals at everything? If not, why not?

19) Do you understand we have documented expenses totaling over \$1,100 dollars to help heal our son safely and effectively after he was discharged from UMC Children's Hospital? Do you further understand that Dr. Terry Pfau told the detectives when asked why he didn't call for an ambulance when my wife and I brought him to Renaissance Health Centre, he responded "he looked stable"? Who got our son "stable" per a medical doctor? We did. Do you further understand that our son started walking again and came back to "life" so to speak after Dr. Pfau administered just one Myer's Cocktail IV? Do you further understand that Dr. Gois, my wife, and I all witnessed this? If not, why not?

20) Do you REALLY believe in your heart that if a children's hospital kills a child that the doctors give a damn? If not, why not?

21) If you are a parent, would you want the "State" or western doctors to dictate to you to take away your parental rights to medical choices in spite of the fact that there are many other SAFE and EFFECTIVE modalities that exist to include Chinese Traditional Medicine and Naturopathic Medicine? Where is it written/codified into LAW, and not a statute, that western medicine is the only CHOICE informed parents have when it comes to the medical decisions for their children? If that were the case, wouldn't that be an unlawful monopoly? If not, why not?

Ms. Rinetti, please look at yourself in the mirror, and ask God, "God, will you please forgive me for all the hell I've put Mr. Sachs and his wife through?"

Please provide your written and thoughtful and complete answers in a reasonable amount of time, say, 3 business days from today, Monday, August 14, 2023.

Thank you.

Mr. Sachs

Dena Rinetti <Dena.Rinetti@clarkcountyda.com>

Wed, Aug 16, 2023 at 12:58 PM

Sir,

This is just argument. Please see the provided discovery.

Sun, Aug 4, 2024 at 11:23 AM

prosecutor Rinetti,

I've been going through my old email correspondence with you and need to address something of critical importance:

Your August 16, 2023, reply in response to my August 14, 2023, email is unacceptable. You stated, "This is just argument" in response to what? 21 questions. A question is NOT argument. What part of THAT don't YOU understand? Under what specific authority do you have the lawful right to ignore my questions? I've stated this a number of times in previous emails, that you are a public servant, however, you have all the appearances of a woman who believes that you are above the law. Do you realize how OBVIOUS that is to reasonable men and women? Are you so out of touch with reality that you cannot put yourself in my shoes for a moment? How would YOU like to be hounded by a prosecutor that completely disregards the facts and the law? Isn't that called tyranny? Isn't that what YOU are perpetuating here? The truth of these matters

are going to continue to be widely disseminated as my wife and I are NOT going to tolerate lawless public servants who took an oath to support and defend the constitutions of Nevada and the United States.

Furthermore, those questions were posed in good faith to arrive at THE TRUTH. **You are reminded that truth does NOT fear investigation.** YOU HAVE MOST CERTAINLY OBSTRUCTED JUSTICE AND DENIED MY DUE PROCESS RIGHTS BY REFUSING TO ANSWER MY LEGITIMATE QUESTIONS AND BY REFUSING TO TASK ONE OF YOUR ON STAFF INVESTIGATORS TO INVESTIGATE THE TRUTHFUL CLAIMS MADE IN THE JOINT DECLARATION MAKING IT PERFECTLY CLEAR THAT THE CHILDREN'S HOSPITAL DOCTORS INJURED MY SON BY THEIR USE OF A MRI CONTRAST DYE CONTAINING ELEMENT NUMBER 64, GADOLINIUM.

YOU have an ongoing **DUTY** to clear the innocent. Is there a valid reason why you continue to willfully and wantonly **REFUSE** to task your on staff investigators regarding this OBVIOUS frame-up of a case?

Is there a reason why, when the entirety of the Nevada lawmakers are courtesy copied on email correspondence to you, that you **STILL** willfully and wantonly ignore it? At this point, it's also fair to ask you, what is your problem? Are you a woman that can look at yourself in the mirror and somehow believe you have the right to destroy the lives of innocent parents who clearly were acting in the best interests of their son?

I require thoughtful answers to all the questions posed herein within 3 business days from today, August 4, 2024.

Thank you.

Attorney-in-fact Sachs

Thu, Aug 8, 2024 at 10:31 AM
prosecutor Rinetti,

This is to put you on NOTICE of your willful and wanton refusal to respond to my August 4, 2024, email within 3 business days. **This matter shall be escalated through your chain of command**, fyi.

Attorney-in-fact Sachs

19th NOTICE - Email correspondence with prosecutor Rinetti (**EXCERPT ONLY**) with subject, "TIME SENSITIVE: Re YOUR DUTY" (**SEE EXHIBIT C**)

Thu, Jan 18, 2024 at 1:14 PM
Ms. Rinetti,

Are you telling me or implying to me that YOU are NOT "legally and ethically obligated in every case to pursue justice" and to protect "the rights of all"? Is that your position Ms. Rinetti?

It would appear so BECAUSE I've already put you on NOTICE in a previous court filing that you had (and to this day, you still do) a DUTY to task one of your on-staff investigators to investigate my CLAIM that the gadolinium in the Bayer

Pharma contrast dye Gadavist had a severely negative impact on my son (my claimed property which NO ONE in the court has rebutted) that, in turn, caused his temporary cachexia/encephalopathy/weight loss, all of which I was wrongly blamed for by detective Slack.

So, you're SUPPOSED to protect the public from me, eh? Let's take a brief look at the facts Ms. Rinetti. Oh, forgive me, the facts are on the moon! So, like Ms. Jobe, you don't care about the facts and you don't care about the law. **THAT IS PAINFULLY OBVIOUS AFTER DEALING WITH YOU AND MS. JOBE FOR OVER 4 YEARS NOW.** Well, the jurors are most certainly going to care about the facts. The fact is the UMC Children's Hospital doctors damaged my son. You did nothing to investigate my claims made under the penalty of perjury in SPITE of being put on NOTICE for your failure to do your duty. Well, that's a serious breach right there. Shall I continue?

20th NOTICE - filed 5/26/2021 by prosecutor Jobe: STATE'S OPPOSITION TO DEFENDANTS PRO SE MOTIONS TO DISMISS CHARGES WITH PREJUDICE FOR PROSECUTORIAL MISCONDUCT AND STATE'S COUNTERMOTION TO STRIKE DEFENDANT'S MOTION FOR VIOLATION OF NRS EDCR 3.20 AND EDCR 7.20

From page 21 of 94:

On April 26, 2021, at Calendar Call of this matter, the following record was made by the Court:

"Ms. Jobe informed the Court the State didn't have any more preparation to do to be ready for trial other than subpoena the witnesses"

[TAKE NOTICE OF THE FACT THAT prosecutor Jobe made the following statement to judge Lilly-Spells verbatim, 4/26/2021: **"Your honor, the State doesn't have any more preparation to do to be prepared to go to trial other than subpoena the witnesses."** I am a witness to this fact. As a reminder, prosecutor Rinetti took over this case around August 2023 for unknown reasons. That equates to her being responsible for this case for approximately a year and a half. So, in 18 months Rinetti isn't adequately prepared to take this matter to trial in spite of the fact that prosecutor Jobe ONLY needed to subpoena her witnesses? Non sequitur! **From the vast record made up to this point, prosecutor Rinetti had every reason to believe a gadolinium expert medical witness was going to be retained for the defense.** Clearly, prosecutor Rinetti has acted in **bad faith** and is attempting to obstruct long overdue justice. Fairness and impartiality demands that her motion to continue the trial be denied especially given the fact she is the head prosecutor for the Special Victims Unit and knows better.]

4. On page 14 of prosecutor Rinetti's continuance motion states:

“As of the filing of this motion, the State is contacting individuals to procure an expert to testify about a subject matter not normally involved in criminal cases.”

THIS IS A LAME EXCUSE AND NOTHING MORE, given the RECORD MADE BEFORE THIS COURT. This is ALSO confirmation of prosecutor's Rinetti's INEXCUSABLE **lack of preparation** that does NOT warrant granting her motion.

5. On page 14 of prosecutor Rinetti's continuance motion states:

“Defendant's notice of expert requires a continuance as the State is required to notice a rebuttal expert witness as well as to research this now known defense witness. Both will take some time.”

THIS IS ANOTHER LAME EXCUSE given the fact that NRS 174.234 (Reciprocal disclosure of lists of witnesses and information relating to expert testimony; continuing duty to disclose; protective orders; sanctions) **only** requires 21 days notice prior to trial the disclosure of an expert witness/expert report. The Nevada lawmakers have seen fit that this 21 days notice is sufficient for an opposing party to “get their act together” to line up an expert rebuttal witness. THIS IS ALSO ANOTHER LAME EXCUSE given the MASSIVE record made before this court (see paragraph #3).

RE THE STATE IS ENTITLED TO DISCOVERY

6. On the bottom of page 15 and the top page 16 prosecutor Rinetti states in her continuance motion:

“In his report, Dr. Semelka states repeatedly that he relied upon information given to him by Defendant Sachs. The State is entitled to those facts which ultimately formulated Dr. Semelka's opinions.”

The prosecutor is ALREADY IN RECEIPT of the majority of information that was provided to Dr. Semelka save for two exceptions:

- 01/20/2019 - Prehospital Care Report Summary - Boulder City Fire Department (7 pages) - This was included with the original discovery documents
- 01/26/2019 - Link to UMC Children's Hospital surveillance video proving Eason was NOT released in “good” condition, nor was he “moving all 4 limbs” nor was he “alert and in no distress” - This was included on the discovery thumb drive provided by Jobe
- 01/20/2019 to 03/07/2019 - Medical records from 1) St Rose Dominican Hospital-Siena Campus 2) UMC Children's Hospital 3) Renaissance Health Centre 4) 4 Kids Care Meridian (723 pages) - This was included with the original discovery documents
- 02/01/2019 to 02/04/2019 - Dr. Hazel Gois (Renaissance Health Centre) “Progress Notes” (4 pages) - This was included with the original discovery documents
- 01/27/2020 - JOINT DECLARATION (Docket numbers 15 thru 19)
- 06/24/2021 - AFFIDAVIT OF FACT (Docket number 69)

Exceptions:

Dr. Semelka was provided the link to the press article from State of the Nation titled, “BEWARE OF MRI-INDUCED GADOLINIUM POISONING” (Link: <https://stateofthenation.co/?p=244469>)

Dr. Semelka was also provided the link to the second press article from State of the Nation titled, "Supreme Court of Nevada lawlessness continues to harm these law-abiding citizens. Here's their response...." (Link: <https://stateofthenation.co/?p=246387>)

REGARDING THE prosecutor's apparent VIOLATION OF NRS 174.234

7. On page 16 of 54 of the former prosecutor's 5/4/2020, "STATE'S NOTICE OF WITNESSES AND/OR EXPERT WITNESSES [NRS 174.234]" it states:

*"The substance of each expert witness's testimony and copy of all **reports** made by or at the direction of the expert witness have been **provided in discovery**."*

As was mentioned in paragraph 3, there were 21 "experts" named. I am NOT in receipt of ANY of this information (**reports**) that was supposedly "**provided in discovery**". Furthermore, now that we are less than 21 days from the February 18, 2025 trial start date, I am still NOT in receipt of ANY expert reports from prosecutor Rinetti. It **appears** the prosecutor is in direct violation of NRS 174.234(2) and 174.234(3)(b) and 174.234(4) is she not? If not, how so? NRS 174.234(2)(3)(b)(4) states:

Reciprocal disclosure of lists of witnesses and information relating to expert testimony; continuing duty to disclose; protective orders; sanctions.

2. If the defendant will be tried for one or more offenses that are punishable as a gross misdemeanor or felony and a witness that a party intends to call during the case in chief of the State or during the case in chief of the defendant is expected to offer testimony as an expert witness, the party who intends to call that witness shall file and serve upon the opposing party, not less than 21 days before trial or at such other time as the court directs, a written notice containing:

- (a) A brief statement regarding the subject matter on which the expert witness is expected to testify and the substance of the testimony;
- (b) A copy of the curriculum vitae of the expert witness; and
- (c) A copy of all reports made by or at the direction of the expert witness.

3. After complying with the provisions of subsections 1 and 2, each party has a continuing duty to file and serve upon the opposing party:

- (b) Any information relating to an expert witness that is required to be disclosed pursuant to subsection 2. A party shall provide information pursuant to this paragraph as soon as practicable after the party obtains that information. The court shall prohibit the party from introducing that information in evidence or shall prohibit the expert witness from testifying if the court determines that the party acted in bad faith by not timely disclosing that information pursuant to subsection 2.

4. Each party has a continuing duty to file and serve upon the opposing party any change in the last known address, or, if applicable, last known place of employment, of any witness that the party intends to call during the case in chief of the State or during the case in chief of the defendant as soon as practicable after the party obtains that information.

This NRS and NRS chapter AND the Nevada Rules of Criminal Procedure AND the RULES OF PRACTICE FOR THE EIGHTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA are all silent with respect to guidance concerning rebuttal witnesses for expert witnesses.

Conversely, paragraph 3(b) of 174.234 may serve as a reference point as it states in the last sentence:

"The court shall prohibit the party from introducing that information in evidence or shall prohibit the expert witness from testifying if the court determines that the party acted in bad faith by not timely disclosing that information pursuant to subsection 2."

It follows logically this sentence can be rewritten factoring in "equal protection" for both parties:

*"The court **shall prohibit** the party from introducing that information in evidence or **shall prohibit the rebuttal expert witness from testifying** if the court determines that the **party acted in bad faith** by not timely disclosing that information pursuant to subsection 2."*

I submit prosecutor **Rinetti HAS MOST CERTAINLY acted in bad faith REPEATEDLY** and only now appears to take this case seriously now that Dr. Semelka has VINDICATED everything we did as parents that was OBVIOUS to ANY/ALL reasonable men and women who have read our court filings signed/submitted under the penalty of perjury **years ago**. Even IF we had not obtained Dr. Semelka, it STILL WOULD HAVE BEEN INCUMBENT UPON prosecutor Rinetti to line up/obtain her own expert witness on gadolinium some 18 months ago when she replaced prosecutor Jobe who was EXPOSED in many court filings to be a CHRONIC LIAR of which prosecutor Rinetti was put on NOTICE of this FACT and did NOTHING. It's not possible to make a more clear record of this ongoing despicable corruption/collusion between Jobe and Rinetti. Regardless, where are your expert reports prosecutor Rinetti?

REGARDING THE RIDICULOUS CLAIMS MADE BY prosecutor Rinetti IN THE LAST PARAGRAPH OF HER MERITLESS CONTINUANCE MOTION

8. On page 16 prosecutor Rinetti states:

"It violates fundamental fairness to require the State to proceed to trial in less than twenty-one (21) days having just received a new expert's report and not having the underlying data supporting the expert's conclusions."

Who are YOU to talk about fundamental fairness prosecutor Rinetti? Since you are apparently in denial to the facts/history of your and prosecutor Jobe's frame-up, you NEED to read paragraph 3 probably a couple THOUSAND TIMES.

I requested YOU investigate our claims how many times? If you had any INKLING of what fundamental fairness means, YOU would have tasked one of your on-staff investigators OR should have called BCPD Slack and tell him to **REOPEN HIS INVESTIGATION** as it was OBVIOUS just by the UMC Surveillance video that Eason was NOT discharged in "good" condition. On this last point alone, you appear to be SEVERELY MENTALLY CHALLENGED or, more likely, you are doing your VERY BEST to be the clandestine counsel for UMC Children's Hospital and their doctors and their business interests, are you not? **The "underlying data supporting the expert's conclusions" has been in YOUR hands for the past 18 months (refer back to paragraph 6)!**

9. On page 16 prosecutor Rinetti states:

"It would be extremely prejudicial to the State if this Court were to force the State to go to trial without allowing the State additional time to receive its entitled discovery and perform the necessary work to rebut this witness's opinions."

It would be EXTREMELY PREJUDICIAL to the defense if this court were to grant the State's frivolous and meritless motion to continue given the FACT that prosecutor **Rinetti, through her own incompetence, has been in receipt of said discovery ever since she replaced Jobe** AND her failure to EVER rebut our claims about our son's OBVIOUS damage at the hands of the UMC Children's Hospital doctors. Or, put another way, when did gadolinium ever become safe prosecutor Rinetti? When did the FDA withdraw their "Black Box Warning" for gadolinium? HINT: They NEVER did. Are you paying attention prosecutor Rinetti? What do you call it when a prosecutor denies reality? Willful blindness? Deliberate indifference? Bad faith? Denial of facts? How about all of the above?

What is also EXTREMELY PREJUDICIAL is the fact that you and Jobe have caused me **REAL damages** from the standpoint that I have not been able to secure regular employment with your malicious frame-up hanging over my head. I've been to several job interviews where I was most certainly qualified and the moment I had to disclose my pending criminal background, I got blank stares from the interviewers. It was CLEAR they wanted nothing to do with me and this IS DIRECTLY YOUR AND JOBE'S AND SLACK'S FAULT!

MY POSITION IS YOU DO NOT HAVE THE RIGHT OR THE AUTHORITY TO HOLD ME UP FROM SECURING EMPLOYMENT TO SUPPORT MY FAMILY! THAT IS THE VERY ESSENCE OF PREJUDICE! YOU ARE NOT "ENTITLED" TO A CONTINUANCE UNDER ANY CIRCUMSTANCES!

The clock for you to "perform the necessary work to rebut" what Dr. Semelka stated (**which parallels what I stated under the penalty of perjury dating back to January 2020**) started 18 months ago when you replaced the chronic liar Jobe. The FACT that you didn't take seriously what I stated repeatedly on the record under penalty of perjury is proof positive of your **gross incompetence** and the fact that as a college educated man that used to work for the National Institutes of Health **SHOULD HAVE** been a big enough tipoff that not every layman is a clueless wonder. Assumption is the mother of all screwups and the position you find yourself in at this time is of your own doing. LEARN TO LIVE WITH IT.

10. On page 16 prosecutor Rinetti states:

"If roles were reverse, the defense would absolutely request a continuance."

That's assuming facts not in evidence. For shame, for shame, for shame Rinetti. You **NEVER** seem to learn, do you? YOU ARE DEAD WRONG! Unlike you, I have studied natural health and healing for over 20 years. I watched western doctors "treat" my parent's symptoms to their detriment. I LEARNED from those and other experiences. If I had been you, upon taking over this frame-up, I would have tasked one of my on-staff investigators or would have had BCPD detective Slack reopen his investigation with a focus on why the father was carrying

out his son from the hospital when the hospital records stated he was released in “good” condition and “moving all 4 limbs” and him being “alert and in no distress”. This isn’t rocket science, but apparently it is to you. I recently did a bit of homework on you Rinetti. Here is a bit of what I found/learned:

REGARDING prosecutor Rinetti’s PUBLIC PROCLAMATIONS IN CONJUNCTION WITH HER FAILED BIDS TO BECOME A JUDGE

11. On Our Nevada Judges, they have a page dedicated to you (LINK: <https://ournevadajudges.com/candidates/dena-irene-rinetti/overview>). On that same page they show your personal website (<https://denarinetti.com/>) which is now defunct. You apparently made the statement on your personal website:

*“I can only hope to help improve the **efficiency** of justice.”*

Well, well, well, isn’t that interesting? Efficiency of justice. Your statement belies your actions or should I say **inaction** in your frame-up, does it not? It is the HEIGHT OF INEFFICIENCY to “claim” you need an expert rebuttal witness at the 11th hour to a case that is over 5 years old, is it not? If not, why not? What were you doing these past 18 months? **YOU MOST CERTAINLY WERE NOT DOING YOUR DUTY.**

Our Nevada Judges quoting your defunct personal website goes on to state:

*“Dena Rinetti’s 13-year career as a prosecutor in the Clark County District Attorney’s Office has provided her with **vast experience involving trial litigation** within the Eighth Judicial District Court, as well as several opportunities to argue cases before the Supreme Court. Her litigation experience has been devoted primarily to matters set for jury trial, and she has tried over 50 jury cases as either lead counsel or co-lead counsel.”*

Oh my, with 13 years (as of the time of that writeup, it’s now 18 years) of “vast experience involving trial litigation” you still managed to fumble and screw up at the 11th hour, have you not? **For lack of proper planning, isn’t that correct?** Because you **REFUSED** to investigate the FACT that gadolinium damaged my son and you apparently thought all this time, “oh, that father doesn’t know what he’s talking about”? **The same father with NO CRIMINAL RECORD that is college educated and previously worked for the National Institutes of Health.** Not only that, because the RECORD before the court shows our family was getting along just fine for some 2 years (when Eason came from China to the United States) and then BAM! He goes to a children’s hospital and in 6 short days the doctors completely jacked him up and then lied about it. Oh, no, THAT COULDN’T POSSIBLY BE according to YOU, the prosecutor with “vast experience”! That “reality” would be BAD for UMC Children’s Hospital and their doctors. **The jurors are going to “see” right through your asinine bluff.**

Our Nevada Judges also discloses that you wanted to be a judge. Given what you’ve done to my wife and I, that **IS** a scary thought. So, in 2020, you wanted to be the Department 24 district court judge and in 2022, you wanted to be the department 7 justice of the peace for the Las Vegas district court. Then, at some point (because there’s no date assigned to your Commission on Judicial Selection application), you applied to be a judge for the department 11 district court (LINK: https://nvcourts.gov/data/assets/pdf_file/0015/26061/rinetti_dena_public.pdf). In that application, you made a number of statements that need addressing as **this counter-affidavit is GOING TO BE DISSEMINATED FAR AND WIDE!** At one point you state:

*"In my professional career, I have dedicated my life to seeking **justice**."*

It appears in the time you wrote those words you CONVENIENTLY forgot what seeking justice means in your frame-up, have you not? What would justice have ACTUALLY LOOKED LIKE? Let me SPELL it out for you:

- Verify the claims made by the parents that gadolinium is dangerous and matched the symptoms of claimed injury. Check.
- Verify why the hospital doctors lied on the discharge record about the boy's discharge condition. Check.
- Verify and confirm that the parents were following Nevada law in their LAWFUL RIGHT to administer nonmedical remedial care in accordance with NRS 200.5085. Check.
- Drop the false felony charges with prejudice and move onto a real case of child neglect/abuse. Check.

See how simple that was? Was that not "**efficient**" enough for you Rinetti?

In your department 11 application, you, Rinetti, go on to state:

"One of the ways I hope to continue my service is by creating an environment where both sides, whether in criminal or civil matters, can have a fair and just resolution."

"An environment where" you "can have a fair and just resolution"? What do you call this? Lip service? A false campaign promise? A load of rubbish? Whether you realize it or not, Rinetti, any reasonable man or woman reading your slop would PUKE in response to your insincerity GIVEN the history and facts of your frame-up against my wife and I. Or, are you that far gone you can't see that?

You, Rinetti, go on to state:

*"As a District Attorney, I had one of largest caseloads in the office. My cases were **quite complex** and required a great deal of time in preparation. I had to speak with detectives, **doctors**, and witnesses. I had to lead investigative efforts after a case had been submitted and **collect a great deal of discovery**."*

It appears you did NONE OF THIS in your frame-up against my wife and I and why is that? Because it went against the business interests of UMC Children's Hospital and their doctors? Yes, that is why, is it not? **Speaking of investigative efforts, the 195 page JOINT DECLARATION with 90 EXHIBITS I composed was a MONUMENTAL UNDERTAKING for a layman.** I spent 2 weeks of my life day and night getting that document ready in time for the writ of habeas corpus hearing only to have the grossly corrupt "actor" in a black robe Hardy claim that he couldn't recall if he had read it. This one document that included peer reviewed medical journal articles proved there was an irrefutable connection between my son's injuries at the hands of the hospital doctors and the gadolinium in the Gadavist MRI contrast dye. So, with your "**quite complex**" cases, the basic facts of this frame-up have somehow escaped you? **THAT ISN'T EVEN REMOTELY BELIEVABLE.** You and Jobe have had an "**agenda**" to falsely persecute my wife and I from the beginning of this fiasco as you have NO SKIN IN YOUR CORRUPT GAME, do you?

You, Rinetti, go on to state:

*“This experience affords me the ability to multitask in a very **efficient** manner. The Eighth Judicial District Court has an enormous number of cases, and each litigant deserves a fair and quick resolution of their matter. **I know that I will be able to meet the demands of the District Court.**”*

I KNOW THAT YOU HAVE NOT, IN FACT, MET THE DEMAND FOR A FAIR AND QUICK RESOLUTION OF YOUR FRAME-UP AGAINST MY WIFE AND I. There's that word “efficient” again. Yes, you're so efficient, you hold onto this frame-up like it's the **ONLY case in your world** and you just can't let it go because we're such terrible parents that did EVERYTHING to get safe and effective healing modalities for our son. You are quite SICK and DEMENTED, are you not? If anyone should be on trial here, it should be you and Jobe and Slack.

You, Rinetti, go on to state:

*“I am also **open-minded**, which I believe is essential for a jurist.”*

Wow, what a WHOPPER of a lie. You are a **CHRONIC LIAR** like Jobe, are you not? IF you were truly **open-minded**, you would have read our court filings signed under the penalty of perjury and then either investigated these matters personally or tasked someone with integrity to do the same. You THEN would have learned that what we have been saying for over 5 miserable years (and thanks to you and Jobe and Slack they have been miserable years) was the absolute truth. From our perspective, you are as **close-minded** as they come and have NO BUSINESS being a prosecutor nor a judge!

You, Rinetti, go on to state:

*“Whether on a general track litigation team, the domestic violence team, or special victims unit, I try to balance the need to **protect the community** with helping to change the lives of those who may just simply need help.”*

Thus spoke the MASSIVE HYPOCRITE that you are. Protect the community? **Are you for real?** What happened in this frame-up? The children's hospital doctors administer a KNOWN POISON (gadolinium with over 1,000 lawsuits against those manufacturers) and you come after my wife and I for child neglect/abuse? How are loving and caring parents a “threat” to the community when they seek out and pursue nonmedical remedial treatment in harmony with NRS 200.5085 AFTER children's hospital doctors injured our son? The help we needed was for you to come to your senses and drop your false charges back in August 2023.

Once again, the jurors are going “see” right through your asinine bluff!

You, Rinetti, go on to state:

“I love learning. I love learning about the law.”

I see NO evidence of any such thing in your frame-up against my wife and I. A person truly who loves learning, would have learned A LOT about natural health and healing from our court filings to the point of understanding there are a number of safe and effective alternatives to what the UMC Children's Hospital doctors were doing to our son. A person who truly loves learning

about the law would have paid attention when I, a college educated layman, pointed out the four (4) Nevada Revised Statutes that protected my wife and I from any alleged wrongdoing:

- NRS 41A.110 - Informed Consent
- NRS 449A.106(6) - Informed Consent
- NRS 126.036 - Parental Rights
- NRS 200.5085 - Right to Nonmedical Remedial Care

To this day, you willfully and wantonly REFUSE to acknowledge these four laws in your frame-up. What you apparently LOVE is putting the screws to my wife and I, isn't that correct? This is all a sort of game to you, isn't it? **YOU CAN GO ON LYING**

ABOUT THIS, BUT, ONE DAY, YOU ARE GOING TO ANSWER TO GOD WHO YOU CAN'T FOOL!

You, Rinetti, go on to state:

*"I love learning new things. For instance, I was solely responsible for several years for prosecuting all severe child abuse cases in Clark County. I had no formal training for a vast period of time on how to prosecute these cases. I took it upon myself to read books, scientific articles, and trial transcripts in order to learn how to prosecute these very important cases. I also spent countless hours with medical professionals learning the science behind these medically intensive cases. I went to hospitals, medical offices, radiology rooms, and the coroner's office trying to learn about the human body, injuries, and various disease processes so that I could ensure an effective and just prosecution. **My work ethic and thirst for knowledge will absolutely prepare me to tackle any task before me as a jurist, whether it is a criminal or civil matter.**"*

Well, Rinetti, the TRUTH says otherwise. You, along with the grossly incompetent police detective Slack and your subordinate Jobe, have bought, hook, line, and sinker, into the false reality that UMC Children's Hospital doctors did nothing wrong to my son. You apparently didn't lift a finger to investigate anything when it was brought to your attention time and again. Your loyalties lie with the children's hospital, that much IS CRYSTAL CLEAR in your frame-up. It's worth repeating here over and over and over again, no matter what YOU think you're getting away with here, you are POSITIVELY GOING TO ANSWER TO GOD ONE OF THESE DAYS. **Your campaign statements are completely disingenuous and now that you've been outed as a CHRONIC LIAR, you have an opportunity to make amends.** You could, somehow, summon the COURAGE to admit you're wrong and have been for some 18 months and drop your false felony charges. The big question is, will you? Or, are you looking forward to being exposed for being a fraud in front of the jurors?

The Nevada Independent has a page dedicated to your 2020 judicial campaign for department 24 district court where you make some additional absurd claims (LINK: <https://projects.thenevadaindependent.com/election/2020/judicial/nv-8/dept-24/dena-rinetti>):

*"Everyone deserves **justice**. I truly believe in the societal ideal engraved on the front of the United States Supreme Court building- Equal **justice** under law."*

Well, if you really "believe" what you claim, then you should "wake up" and actually administer "**justice**" and drop your false felony charges stat. **Justice** is sometimes defined as fairness and equality and accountability and responsibility and protection of rights. Did you get that? If you were a parent, and took your child to a children's hospital, and they jacked him/her up, and then

lied that your child was released in “good” condition, and you end up being arrested for neglect/abuse, would you seek justice? The answer is self-evident to all reasonable men and women.

Why are the basics of your frame-up so hard for you to understand/comprehend? I’ve been saying of late it’s because you are quietly protecting UMC Children’s Hospital and their doctors and their business interests, isn’t that so? How could it possibly be otherwise? What sane/rational man or woman is going to buy into whatever concocted “theory” you have of this frame-up when they hear the TRUTH of these matters? The fact that you willfully and wantonly remain in denial of these basic facts is going to make it that much easier to convince the jurors you are not fit for duty. Since there can be no reasonable doubt (your burden), you’re going to somehow have to convince 12 men and women that it was **IMPOSSIBLE** for the UMC Children’s Hospital doctors to have injured my son, isn’t that correct? **Are you that daft to believe 12 jurors are not going to think you’re insane after looking at the pictures of our injured son at the hands of the doctors and the UMC surveillance video?**

On this same page, a bit further down, you go on to state:

“The most important lesson is to never give up in seeking a just outcome to a case.”

That’s about the only thing I can agree with you on as in, **I’m NEVER GIVING UP IN SEEKING A JUST OUTCOME against your frame-up.**

REGARDING THE prosecutor DOES NOT HAVE GOOD CAUSE OR SUFFICIENT CAUSE FOR A TRIAL CONTINUANCE

12. In looking at what the higher courts have said about “good cause” and “sufficient cause” with respect to a trial continuance boils down to a single question:

*Was there an **unforeseen circumstance** that warrants granting a continuance?*

So, was it an **unforeseen circumstance** that the defense was going to obtain a gadolinium expert and written report? No. Make that HELL NO. The record made herein and before this court makes that abundantly clear. Did Rinetti fail to properly prepare for this KNOWN circumstance? Yes. Is she entitled to a continuance under these circumstances? Isn’t that abundantly clear by now? The answer is a RESOUNDING NO. This case is over 5 years old. **She was informed about the known dangers of gadolinium REPEATEDLY and IF she doubted that, she had a DUTY over a year ago to line up her own gadolinium rebuttal witness.** With respect to her request for missing discovery, that was adequately addressed in paragraph 6. The two press article exceptions are simply an accounting of the legal corruption my wife and I have had to deal with and were NOT critical to Dr. Semelka’s underlying understanding of the MEDICAL facts. As was previously mentioned in paragraph 9, it truly GOES FAR BEYOND being prejudicial to continue this frame-up as our family has been financially DEVASTATED because of Slack, and Jobe, and Rinetti’s fraud. **We REQUIRE IMMEDIATE RELIEF THAT WE ARE ENTITLED ENTITLED TO PER the Constitution of the United States 14th Amendment (nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws) and the Constitution of the State of Nevada, Article 1, Section 8, paragraph 2, (No person shall be deprived of life, liberty, or property, without due process of law).**

CONCLUSION - THE COURT MUST DENY THE MOTION TO CONTINUE AS JUSTICE DELAYED IS JUSTICE DENIED

13. Per Dougan v. Gustaveson, 835 P. 2d 795 - Nev: Supreme Court 1992 and Weddell v. Stewart, 261 P. 3d 1080 - Nev: Supreme Court 2011 and Reed v. Reed, No. 82575, Nev: Supreme Court 2022 and Johnson v. STATE, DEPARTMENT OF CORRECTIONS, Nev: Court of Appeals 2020, "**justice delayed is justice denied**".

During a hearing months ago, this court made a statement to the effect that the State had a right to bring this matter to trial. By the same token, the State does not have the unilateral right to impose its will on the court due to an **obvious** lack of proper planning/preparation. It was prosecutor Rinetti that gave every indication she was ready to go to trial this past August. Everything in her continuance motion amounts to one lame excuse after another as justification to delay the inevitable.

The record made herein to oppose Rinetti's motion is grounded in the irrefutable fact that she willfully and wantonly refused to do her due diligence to timely secure her own gadolinium expert witness some 18 months ago. Her meritless motion SHOCKS THE CONSCIOUS OF THE COURT. Or put another way, how can she, with a straight face, tell this court she's not ready when she had more than ample opportunity to locate and retain any/all of her witnesses, whether they be lay witnesses or expert witnesses or rebuttal witnesses. It's worth pointing out here, a truly experienced and organized prosecutor would have **correctly ANTICIPATED** the need for any of her rebuttal witnesses. It should have been as simple as Rinetti picking up the phone to say, "oh, I'm going to need you now for trial". If that meant lining up several gadolinium experts or gadolinium rebuttal experts, that should have been done. That is the REAL practice of avoiding an "unforeseen circumstance". Rinetti is not some rookie prosecutor. She's been around the block for quite a long time at the Eighth Judicial District Court and has NO EXCUSES for her incompetence. By virtue of her own public proclamations stated in paragraph 11 we are supposed to believe she has her act together which could not be further from the truth with her PERVERSE delay tactic in this matter.

Justice is supposed to be about fairness, and taking that a step further, that would be fundamental fairness. Clearly, it is fundamentally unfair to accommodate the head prosecutor of the Special Victims Unit who appears to have an endless amount of public resources to squander on a frame-up such as this. **How is this protecting the community or serving the community?** If that is ultimately what this amounts to, then there appears to be no bounds of shame that Rinetti won't lower herself to, to win at ALL COSTS. **Speaking of costs, delaying this trial is going to incur significant economic damages of which the responsible actors shall be held accountable in their official and individual capacities to the fullest extent of the law by virtue of this NOTICE herein this counter-affidavit.**

Wherefore, based on the foregoing, I, the falsely accused, respectfully request this court deny the prosecutor's frivolous and meritless motion with prejudice without further ado in the name of timely justice.

Reserving ALL my Natural God-Given Unalienable Rights, Waving None, Ever.

I declare and will testify viva voce, in open court, under penalty of perjury that all herein be true and correct. Executed on this 3rd day, of the 2nd month, in the year of our Lord and Savior, two thousand twenty five.

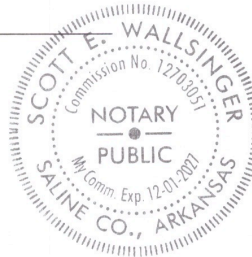
Attorney-in-fact Sachs
Attorney-in-fact Sachs

Notary used without prejudice to my rights:

BE IT REMEMBERED, That on this 3rd day of February in the year of our LORD, two thousand twenty five, personally appeared before me, the Subscriber, a Notary Public for the State of Arkansas, Attorney-in-fact Sachs, party to this Document, known to me personally to be such, and he acknowledged this Document to be his act and deed. Given under my hand and seal of office, the day and year aforesaid.

Scott E. Wallsinger

Notary Public Sitting in, and for, The State of Arkansas



CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the attached COUNTER-AFFIDAVIT OF TRUTH PURSUANT TO RULE 15 CONTINUANCES TO THE NEVADA RULES OF CRIMINAL PRACTICE was e-filed on February 3, 2025 to:

STEVEN B. WOLFSON, Clark County District Attorney
DENA RINETTI, Chief Deputy District Attorney
CHARLES GOODWIN, counsel to Attorney-in-fact Sachs
TRAVIS SHETLER, counsel to Attorney-in-fact Zhang

EMAIL: motions@clarkcountyda.com
dena.rinetti@clarkcountyda.com
charles@goodwinlawgroup.net
travis@shetlerlawfirm.com

Attorney-in-fact Sachs

Attorney-in-fact Sachs for the Defendant

HOW DID WE GO FROM THIS.....



TO THIS.....??? And His Weight Loss?



EXHIBIT A

The answer is GADAVIST!!!!



What is GADAVIST?

Per the Bayer HealthCare Pharmaceuticals Inc. **package insert**:

“Gadavist is a **gadolinium**-based contrast agent indicated for intravenous use in diagnostic MRI in adults and children (2 years of age and older) to detect and visualize areas with disrupted blood brain barrier (BBB) and/or abnormal vascularity of the central nervous system.”

(GBCA's): Gadolinium-Based Contrast Agents are intravenous drugs used in diagnostic imaging procedures to enhance the quality of magnetic resonance imaging (MRI)

What is gadolinium? (Gadolinium is IN GADAVIST)

Gd

64
157.25



Gadolinium

Would you want this METAL floating around in YOUR BODY???

* "Gadolinium is a chemical element carrying the atomic number 64 and the atomic symbol Gd. Belonging to a group of elements in the periodic table called Lanthanides, the chemical is a rare earth element typically used in microwave applications, color TV tubes, synthetic gemstones, compact discs, and computer memory. This chemical element is widely used as an injectable contrast agent when patients undergo magnetic resonance Imaging (MRI) and magnetic resonance angiography (MRA) scans.

Before undergoing an MRI or MRA, a gadolinium contrast agent is injected into the bloodstream and is stored in the blood vessels and abnormal tissue. This is so doctors can easily detect and trace any problems found within the body. *Previously, researchers said this chemical element was safe for use in MRIs and MRAs.*

In fact, the element is *Very toxic.*

The kidneys are supposed to expel the chemical after receiving the injection.

However, *regardless* of kidney health patients can develop complications from the element spreading in the body."

(MORE ON THIS LAST STATEMENT LATER)

*Source: <http://www.mblynchfirm.com/2018/05/10/testing-for-gadolinium-toxicity/>
(The Michael Brady Lynch Firm - a national complex litigation trial firm)

Why would it be necessary to put a “**very toxic**” metal element in Y.L.'s body just to improve the contrast in a MRI?”

ANSWER: IT WAS **NOT NECESSARY!**
THE UMC DOCTOR(S) THAT WERE RESPONSIBLE FOR THIS DECISION have committted medical malpractice. Y.L.'s KIDNEYS WERE IN FACT POSITIVELY COMPROMISED BY ALL THE TOXIC SO-CALLED MEDICATIONS THAT WERE ADMINISTERED TO Y.L. for “seizures” that WERE **NEVER PROVEN NOR PROPERLY DIAGNOSED by UMC: _____

What did the father of medicine have to say about all this? _____

*****Hippocrates** is considered to be the **father of modern medicine** because in his books, which are more than 70. He described in a scientific manner, many diseases and their treatment after detailed observation. He lived about 2400 years ago.”

“Some of his important aphorisms were: “As to diseases, make a habit of two things -to help or at least to ***do no harm”. Also: “Those by nature over weight, ***die earlier than the slim.***”

*Source: <https://www.ncbi.nlm.nih.gov/pubmed/18392218>

****Refer to the proof of this in the following pages of this document.**

Are you aware that most U.S. doctors take the Hippocratic Oath before they begin “practicing” medicine?



We, the parents, submit, that the UMC Doctor(s) responsible for injecting a KNOWN TOXIC POISON INTO OUR SON'S BODY ARE GUILTY OF MEDICAL MALPRACTICE THAT CAUSED EASON TO LOSE WEIGHT

**How do we KNOW GADAVIST was injected into Eason? Here is the proof:
(Page 54 of 723 from Original Discovery Documents - UMC)**



UMC MRO

Liu, Yichen

MRN: 1000320050, DOB: 10/19/2010, Sex: M

Adm: 1/20/2019, D/C: 1/26/2019

Medications - All Orders and Results (continued)

valproic acid (DEPAKENE) 250 mg/5 mL 50 mg/mL solution [19867146] (continued)

Electronically signed by: Brooke Finger, MD on 01/26/19 1451

Status: Active

Ordering user: Brooke Finger, MD 01/26/19 1451

Ordering provider: Brooke Finger, MD

Authorized by: Brooke Finger, MD

Frequency: BID 01/26/19 - 365 days

Diagnoses

Seizure (CMS/HCC)

gadobutrol (GADAVIST) 1 mmol/mL injection - ADS Override Pull [19867141]

Electronically signed by: Interface, Ads Dispense on 01/26/19 0944

Status: Completed

Ordering user: Interface, Ads Dispense 01/26/19 0944

Frequency: 01/26/19 0944 - 1 occurrence

Medication comments: Tumang, Joseph Walter : cabinet override

At 9:44am on Saturday, January 26th, 2019, Joseph Walter Tumang either ordered or entered GADAVIST into UMC's medical record.

**Further proof of the use of GADAVIST on Eason:
(Page 156 of 723 from Original Discovery Documents - UMC)**

Feb. 5, 2019 8:28AM

No. 7783 P. 9
Page 1 of 5

MR Brain with and without contrast

RESULT

Status: Final result

PACS Images

[Click here to view images](#)

Study Result

CLINICAL HISTORY: seizure

COMPARISON STUDIES: None currently available

TECHNIQUE: Multi-planar and multi-sequence imaging of the brain was obtained with and without IV contrast. 2 ml Gadavist was used for the study.

FINDINGS: There is no acute intracranial hemorrhage. There is no hydrocephalus. No acute CVA is seen. No mass or mass-effect is identified. The hippocampi demonstrate symmetric size, signal, and contour.

No areas of abnormal enhancement are identified on the post contrasted study.

The orbits demonstrate no acute abnormalities.

The visualized paranasal sinuses demonstrate no acute abnormalities. Mild enlargement of adenoids is present.

IMPRESSION:

1. No acute intracranial disease.

Signed by

Signed

NGUYEN, VAN T

Date/Time

1/26/2019 11:09

Phone

702-759-8600

Pager

Exam Information

Status

Final [99]

Exam

Began

1/26/2019 09:57

Exam

Ended

1/26/2019 10:33

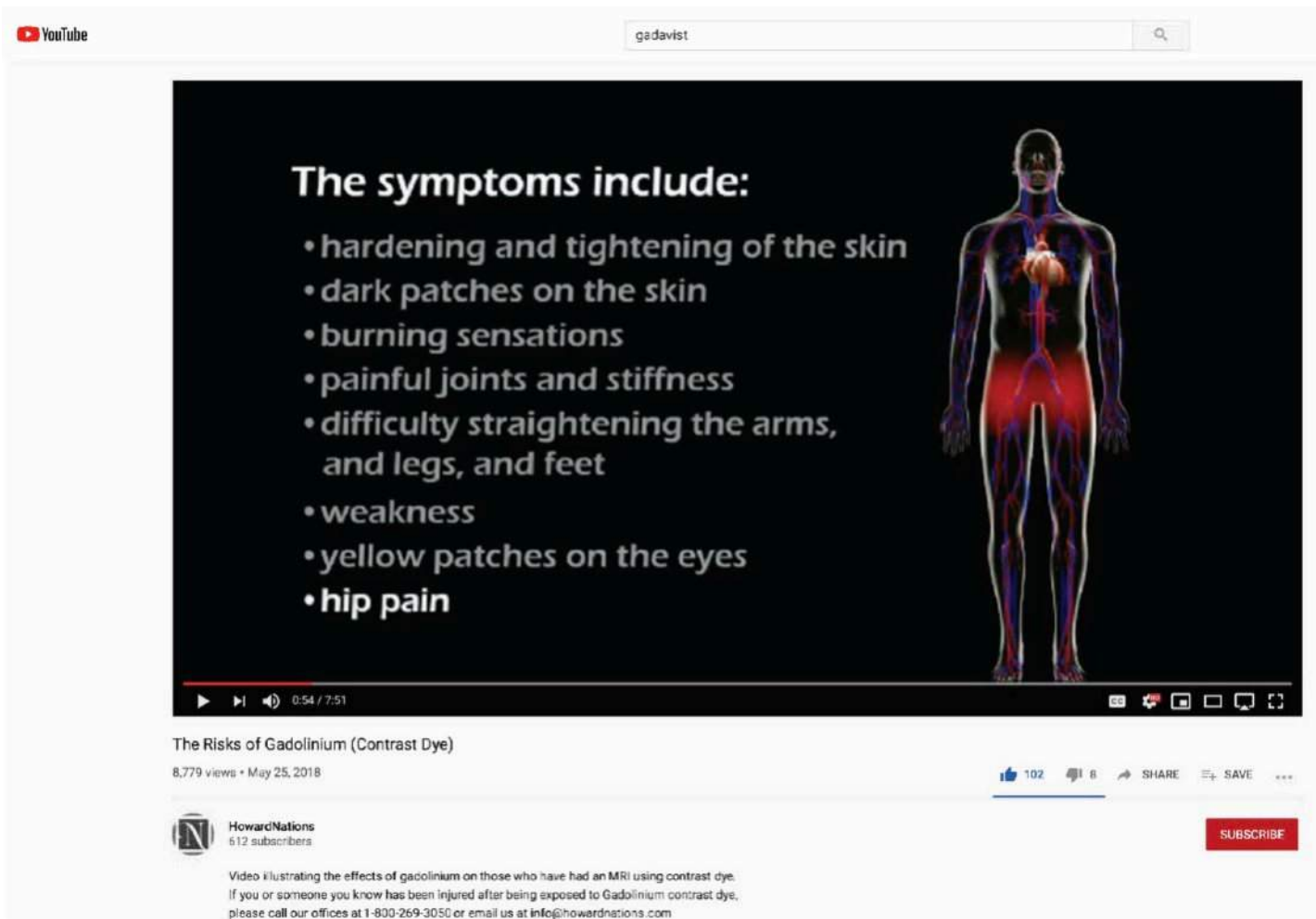
External Results Report

[Open External Results Report](#)

Encounter

[View Encounter](#)

It is **NECESSARY** to get a better idea of what GADAVIST does in the human body. Below are a number of screenshots from a [YouTube.com](https://www.youtube.com/watch?v=C4Nu47Vdm7Y&t=10s) video (<https://www.youtube.com/watch?v=C4Nu47Vdm7Y&t=10s>) entitled, **“The Risks of Gadolinium (Contrast Dye)”**. This short video (7 minutes, 51 seconds) provides an excellent overview of how dangerous GADAVIST is courtesy of the Howard Nations Law Firm (www.howardnations.com):

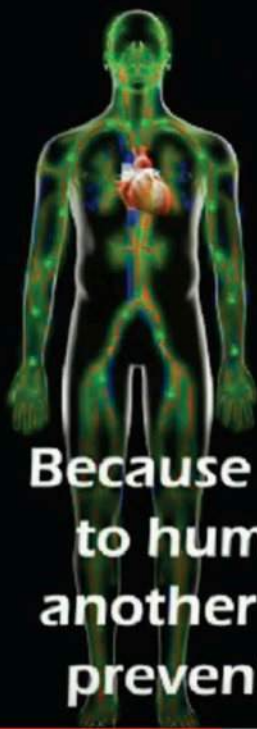


Y.L. POSITIVELY suffered from **“painful joints and stiffness”** and **“difficulty straightening the arms, legs, and feet”** and **“weakness”** as witnessed by the parents IMMEDIATELY AFTER THE SEDATIVE WORE OFF FOLLOWING THE MRI on Saturday, January 26th, 2019 to the time Y.L. was **illegally kidnapped by CPS** (Child Protective Services) on the night of Sunday, February 3rd, 2019 (just before midnight). It was **ILLEGAL** because there was **NO COURT SIGNED ORDER, THERE WAS NO EMERGENCY, WE DID NOT CONSENT TO EASON’S KIDNAPPING, AND EASON WAS ALREADY UNDER THE CARE OF OUR DOCTOR, AND BECAUSE IT VIOLATED NRS 200.5085 WHICH STATES:**

NRS 200.5085:

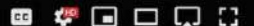
“Use of nonmedical remedial treatment. A child is not abused or neglected, nor is the child’s health or welfare harmed or threatened for the sole reason that his or her parent or guardian, in good faith, selects and depends upon nonmedical remedial treatment for such child, if such treatment is recognized and permitted under the laws of this State in lieu of medical treatment.”

gadavist



Because free gadolinium is very toxic to human tissues, it is attached to another chemical called a chelate to prevent it from harming the body.

2:15 / 7:51



The Risks of Gadolinium (Contrast Dye)

8,779 views • May 25, 2018

102 8 SHARE SAVE ...

NOTICE WHAT IS SAID, GADOLINIUM IS **“VERY TOXIC”** AND AS YOU’LL SEE FURTHER ON THE CHELATE BREAKS DOWN (SEPARATING FROM THE GADOLINIUM) AFTER IT STAYS IN THE BODY LEAVING WHAT IS CALLED “FREE GADOLINIUM” WHICH CAUSES A MULTITUDE OF **SEVERE ISSUES**.

YouTube

gadavist

However, in patients with poor kidney function, less gadolinium contrast is removed from the body.

The Risks of Gadolinium (Contrast Dye)

8,869 views · May 25, 2018

103 8 SHARE SAVE

HowardNations

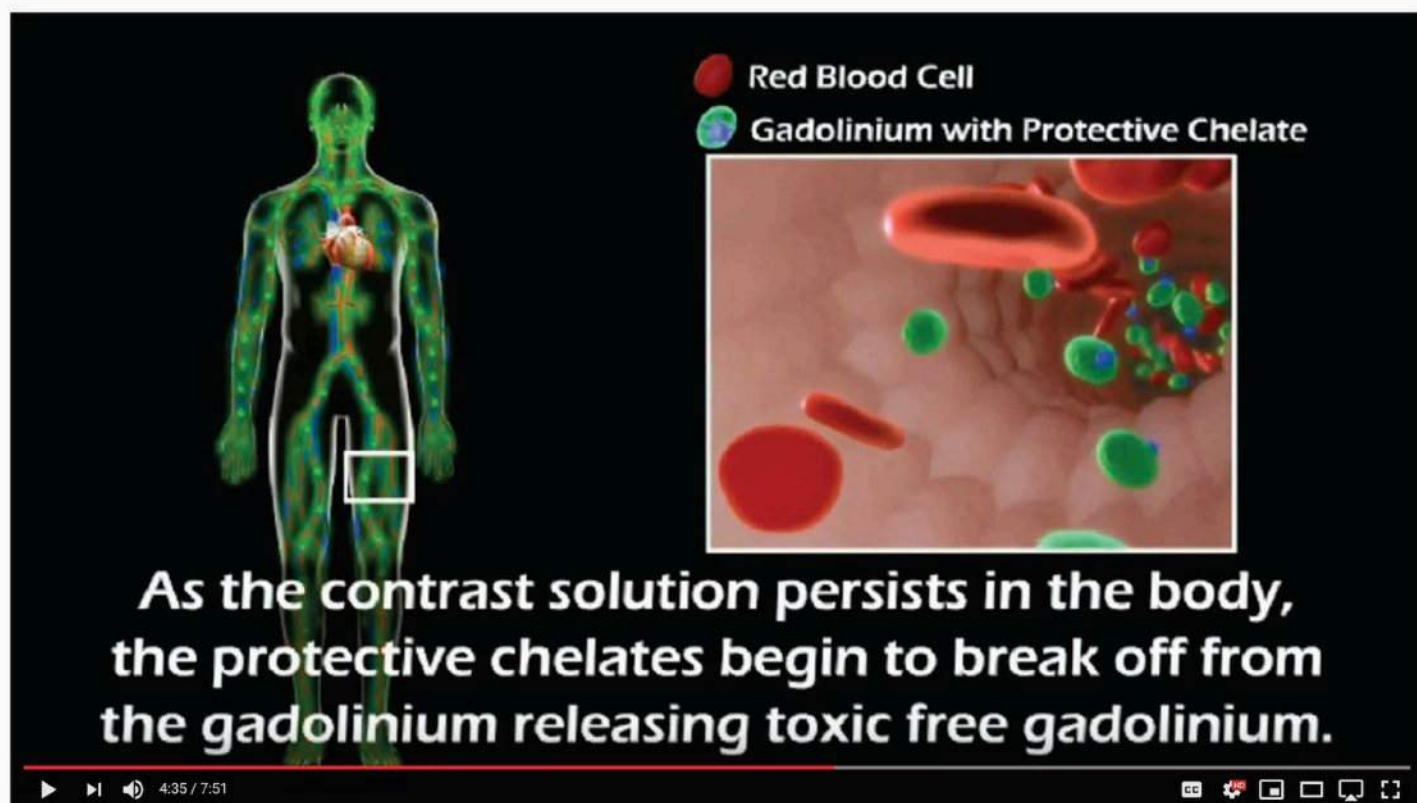
SUBSCRIBE

REMEMBER FROM PAGE 3, IT IS NOT EVEN NECESSARY FOR 'POOR KIDNEY FUNCTION' AS STATED ABOVE TO CAUSE SOME GADOLINIUM TO REMAIN IN THE BODY WHICH RESULTS IN DETRIMENTAL HEALTH EFFECTS:

“However, *regardless* of kidney health patients *can* develop complications from the element spreading in the body.”

***Source: <http://www.mblynchfirm.com/2018/05/10/testing-for-gadolinium-toxicity/>**

Y.L.'s kidney's were *in fact* compromised by the doctors at UMC with all the acidic/poisonous so-called medications given to him prior to his MRI on the last day of his “treatment”. “TREATMENT” is not the same as healing. Western doctors don't KNOW HOW TO HEAL ANYTHING. They are ONLY TRAINED TO “TREAT” SYMPTOMS. THIS IS INCREDIBLY IRRESPONSIBLE AND WE AS THE PARENTS KNEW THIS, THAT’S WHY WE WANTED Y.L. RELEASED FROM UMC IMMEDIATELY AND THEY VIOLATED NRS 200.5085 BY NOT HONORING OUR LEGAL RIGHTS



The Risks of Gadolinium (Contrast Dye)

8,779 views • May 25, 2018

102 8 SHARE SAVE

This statement of FACT by the Howard Nations Law Firm is SIGNIFICANT because this is EXACTLY what happened to Y.L. He had a KNOWN TOXIN/POISON floating around his bloodstream that led to all the debilitating symptoms that were witnessed by the parents and by CPS and by the negligent doctors at UMC that were DIRECTLY RESPONSIBLE for Y.L. maladies. UMC Children's Hospital doctors are criminally negligent for their actions. UMC Children's Hospital doctors had a duty to test Y.L. for gadolinium in his body after the MRI and upon his second admission to UMC and failed to do so.

The symptoms include:
**Burning Sensations,
Joint Pain, and Joint Stiffness**



The Risks of Gadolinium (Contrast Dye)

8,779 views • May 25, 2018

102 8 SHARE SAVE ...

BELOW IS PAGE 13 OF THE GRAND JURY TESTIMONY, LINES 6 THRU 10, DAY 2, Q&A WITH CPS MELINDA PACELLI:

NOTE: THE COURT STENOGRAPHER USED THE WRONG GENDER FOR Y.L. RECORDING "HIS" AS A "HER" IN THE (Q) QUESTION PORTION. THE FOLLOWING QUOTE FROM THE TESTIMONY HAS BEEN CORRECTED:

Q For the record the witness held up both his hands kind of curved to his body, kind of curled his wrists inward and fists kind of closed; is that correct?

A Yes, and the muscles were tight and he was definitely stiff.

LOOK AT THE SLIDE ABOVE AND LOOK AT THE WORD CPS USED, "STIFF." CAUSE: GADAVIST!



BELOW IS PAGE 15 (lines 20 thru 25) and PAGE 16 (lines 1 thru 7) OF THE GRAND JURY TESTIMONY, DAY 2, Q&A WITH CPS MELINDA PACELLI:

Q And at the point the child was going to be transported, did you or anyone else try to dress the child?

A The parents attempted to put a jacket on the child.

Q And was that successful?

A No, because the atrophy and the muscles were so tight they couldn't move his arms to get a jacket on.

Q And was that based on your observations of them trying to put the jacket on?

A Several times they attempted to put the jacket on.

LOOK AT THE SLIDE ABOVE, DO YOU “SEE” A CONNECTION BETWEEN “difficulty straightening the arms” and trying to get a jacket on Eason when his body was so stiff due to the GADAVIST/GADOLINIUM METAL IN HIS BODY?

THE TWO ARE DIRECTLY RELATED!



BELOW IS PAGE 63 (lines 5 thru 8) OF THE GRAND JURY TESTIMONY, DAY 1, Q&A WITH KERRI SALOMON, MEDICAL ASSISTANT AT RENAISSANCE HEALTH CENTRE:

“He was like laying limp and sort of unresponsive. He wasn't making eye contact. I had like an impression that he had like maybe cerebral palsy or I thought he was a disabled child.”

“Laying limp” looks A LOT LIKE WEAKNESS, JUST LOOK AT THE SLIDE ABOVE. Also, Ms. Salomon thought Eason might have had “cerebral palsy”. *“The primary effect of Cerebral Palsy is impairment of muscle tone, gross and fine motor functions, balance, control, coordination, reflexes, and posture”* (<https://www.cerebralpalsy.org/about-cerebral-palsy/sign-and-symptoms>).

COMPARE GADOLINIUM’S “painful joints and stiffness” and “difficulty straightening the arms, legs, and feet” and “weakness” to cerebral palsy’s “impairment ofmotor functions, balance, and posture” and you have an almost exact match of outward physical symptoms. Or, put another way, Ms. Salomon thought Eason was injured. The physical symptoms displayed by Y.L. match the contraindications of GADAVIST.

Before we turn our attention to what the manufacturer of GADAVIST (Bayer HealthCare PHARMaceuticals Inc) **warns** about, let's look briefly at **crooked deception** behind this product from the Michael Brady Lynch Law Firm:



“Regardless of Warnings Doctors Keep Pushing Gadolinium

Even though in December of 2017, the FDA issued a tougher warning on **gadolinium**, the dye used in MRI and MRA scans,

doctors still push patients to use the hazardous chemical. The government agency is calling for additional studies and urging doctors to be careful. **However, the medical field isn't heeding the warnings.**

About Gadolinium

It doesn't matter a patient's health beforehand. Top level athletes or young parents have been unable to work again after **Gadolinium Deposition Disease (GDD)**. Treatments are costly, and there is not a cure.

Doctors Pushing Gadolinium

In the FDA **warning**, the agency recommended that radiologists consider how much gadolinium might be left behind in a patient's body when selecting a gadolinium-based contrast agent for scans. Also, patients receiving MRIs should now receive a medication guide outlining issues about the chemical agent. However, patients are saying this isn't the case. **Doctors are not educating patients on the side effects of this dye (Yuxia was NOT EDUCATED on these hazardous side effects by UMC doctors).** The community is still pushing that since the chemical agent has been used for 30 years that it must be safe. Then, when a patient develops GDD, the doctor doesn't believe him or her.

Kickbacks

A theory has been proposed as to why medical professionals keep pushing this deadly dye even with FDA warnings. It is because of pharmaceutical company kickbacks. For example, Dr. Prince is a renown medical doctor on the board of the Medical Advisory Council of the Global Fibrosis Foundation (GFF). GFF advocates for patients with nephrogenic systemic fibrosis (NSF). NSF is a documented reaction to gadolinium injections. These injections injured many people and gave them NSF. **Yet, Dr. Prince began denying the existence of NSF.** ProPublica's **Dollars for Docs** shows he **received \$3 million in royalties** from 2013 to 2015. The **bulk** of the royalties came from the manufacturers of GBCAs. These include Bayer Pharmaceuticals makers of Magnevist, \$1.68 million, and **Gadavist**, \$1.42 million. **Also, Dr. Prince went as far as authoring a study funded by Bayer on the dye.** **The report says that they found gadolinium hot spots of retention but no clinical effects.** Medscape published the study on January 25, 2016, and the last payment Dr. Prince received from Bayer was on December 31, 2015.

Not only is Dr. Prince **harming patients, but he is also fooling the entire medical community into believing these dyes are perfectly safe.”**

(Source: <http://www.mbrlynchfirm.com/2018/06/19/regardless-of-warnings-doctors-keep-pushing-gadolinium/>)

FROM THE MANUFACTURER OF GADAVIST (Selected excerpts):

© 2011, Bayer HealthCare Pharmaceuticals Inc. All rights reserved.

HIGHLIGHTS OF PRESCRIBING INFORMATION

These highlights do not include all the information needed to use GADAVIST safely and effectively. See full prescribing information for GADAVIST.

GADAVIST (gadobutrol) injection, for intravenous use Initial U.S.

Approval: 2011

WARNING: NEPHROGENIC SYSTEMIC FIBROSIS (NSF)

See full prescribing information for complete boxed warning

Gadolinium-based contrast agents (GBCAs) increase the risk for NSF among patients with impaired elimination of the drugs. Avoid use of GBCAs in these patients unless the diagnostic information is essential and not available with non-contrasted MRI or other modalities.

- The risk for NSF appears highest among patients with:
 - Chronic, severe kidney disease ($\text{GFR} < 30 \text{ mL/min/1.73m}^2$), or
 - Acute kidney injury.
- Screen patients for acute kidney injury and other conditions that may reduce renal function. For patients at risk for chronically reduced renal function (for example, age >60 years, hypertension or diabetes), estimate the glomerular filtration rate (GFR) through laboratory testing (5.1).

-----DOSAGE AND ADMINISTRATION-----

Recommended dose for adults and pediatric patients (including term neonates) is 0.1 mL/kg body weight (2.1)

Administer as an intravenous bolus injection (2.2)

Follow injection with a normal saline flush (2.2)

-----WARNINGS AND PRECAUTIONS-----

Nephrogenic Systemic Fibrosis has occurred in patients with impaired elimination of GBCAs. Higher than recommended dosing or repeated dosing appears to increase the risk. (5.1)

Anaphylactic and other hypersensitivity reactions with cardiovascular, respiratory or cutaneous manifestations, ranging from mild to severe, including death, have occurred. Monitor patients closely during and after administration of Gadavist. (5.2)

Gadolinium is retained for months or years in brain, bone, and other organs. (5.3)

WARNINGS AND PRECAUTIONS

Nephrogenic Systemic Fibrosis

NSF may result in fatal or debilitating fibros

affecting the skin, muscle and internal organs. Report any diagnosis of NSF following Gadavist administration to Bayer

5.3 Gadolinium Retention

Gadolinium is retained for months or years in several organs. The highest concentrations (nanomoles per gram of tissue) have been identified in the bone, followed by other organs (for example, brain, skin, kidney, liver, and spleen). The duration of retention also varies by tissue and is longest in bone.

Consequences of gadolinium retention in the brain have not been established. Pathologic and clinical consequences of GBCA administration and retention in skin and other organs have been established in patients with impaired renal function [see *Warnings and Precautions* (5.1)]. There are rare reports of pathologic skin changes in patients with normal renal function. Adverse events involving multiple organ systems have been reported in patients with normal renal function without an established causal link to gadolinium retention [see *Adverse Reactions* (6.2)].

While clinical consequences of gadolinium retention have not been established in patients with normal renal function, certain patients might be at higher risk. These include patients requiring multiple lifetime doses, pregnant and pediatric patients, and patients with inflammatory conditions. Consider the retention characteristics of the agent when choosing a GBCA for these patients. Minimize repetitive GBCA imaging studies particularly closely spaced studies, when possible.

6 ADVERSE REACTIONS

Table 2: Adverse Reactions

Dizziness
Paresthesia
Dyspnea

Adverse reactions that occurred with a frequency of $< 0.1\%$ in subjects who received Gadavist include: hypersensitivity/anaphylactic reaction, loss of consciousness, convulsion, parosmia, tachycardia, palpitation, dry mouth, malaise and feeling cold.

6.2 Postmarketing Experience

The following additional adverse reactions have been reported during postmarketing use of Gadavist. Because these reactions are reported voluntarily from a population of uncertain size, it is not possible to reliably estimate their frequency or establish a causal relationship to drug exposure.

Cardiac arrest

Nephrogenic Systemic Fibrosis (NSF)

Hypersensitivity reactions (anaphylactic shock, circulatory collapse, respiratory arrest, pulmonary edema, bronchospasm, cyanosis, oropharyngeal swelling, laryngeal edema, blood pressure increased, chest pain, angioedema, conjunctivitis, hyperhidrosis, cough, sneezing, burning sensation, and pallor) [*see Warnings and Precautions (5.2)*].

General Disorders and Administration Site Conditions: Adverse events with variable onset and duration have been reported after GBCA administration [*see Warnings and Precautions (5.3)*]. These include fatigue, asthenia, pain syndromes, and heterogeneous clusters of symptoms in the neurological, cutaneous, and musculoskeletal systems.

Skin: Gadolinium associated plaques

17 PATIENT COUNSELING INFORMATION

Advise the patient to read the FDA-approved patient labeling (Medication Guide).

General Precautions

Gadolinium Retention

Advise patients that gadolinium is retained for months or years in brain, bone, skin, and other organs in patients with normal renal function. The clinical consequences of retention are unknown. Retention depends on multiple factors and is greater following administration of linear GBCAs than following administration of macrocyclic GBCAs. [*see Warnings and Precautions (5.3)*].

FROM THE MANUFACTURER OF GADAVIST (Selected excerpts - continued):

Medication Guide

<p style="text-align: center;">MEDICATION GUIDE GADAVIST (gad-a-vist) (gadobutrol) Injection for intravenous use</p>
<p>What is Gadavist?</p> <ul style="list-style-type: none"> Gadavist is a prescription medicine called a gadolinium-based contrast agent (GBCA). Gadavist, like other GBCAs, is injected into your vein and used with a magnetic resonance imaging (MRI) scanner. An MRI exam with a GBCA, including Gadavist, helps your doctor to see problems better than an MRI exam without a GBCA. Your doctor has reviewed your medical records and has determined that you would benefit from using a GBCA with your MRI exam.
<p>What is the most important information I should know about Gadavist?</p> <ul style="list-style-type: none"> Gadavist contains a metal called gadolinium. Small amounts of gadolinium can stay in your body including the brain, bones, skin and other parts of your body for a long time (several months to years). It is not known how gadolinium may affect you, but so far, studies have not found harmful effects in patients with normal kidneys. Rarely, patients have reported pains, tiredness, and skin, muscle or bone ailments for a long time, but these symptoms have not been directly linked to gadolinium. There are different GBCAs that can be used for your MRI exam. The amount of gadolinium that stays in the body is different for different gadolinium medicines. Gadolinium stays in the body more after Omniscan or Optimark than after Eovist, Magnevist, or MultiHance. Gadolinium stays in the body the least after Dotarem, Gadavist, or ProHance. People who get many doses of gadolinium medicines, women who are pregnant and young children may be at increased risk from gadolinium staying in the body. Some people with kidney problems who get gadolinium medicines can develop a condition with severe thickening of the skin, muscles and other organs in the body (nephrogenic systemic fibrosis). Your healthcare provider should screen you to see how well your kidneys are working before you receive Gadavist.
<p>Do not receive Gadavist if you have had a severe allergic reaction to Gadavist.</p>
<p>Before receiving Gadavist, tell your healthcare provider about all your medical conditions, including if you:</p> <ul style="list-style-type: none"> have had any MRI procedures in the past where you received a GBCA. Your healthcare provider may ask you for more information including the dates of these MRI procedures. are pregnant or plan to become pregnant. It is not known if Gadavist can harm your unborn baby. Talk to your healthcare provider about the possible risks to an unborn baby if a GBCA such as Gadavist is received during pregnancy. have kidney problems, diabetes, or high blood pressure have had an allergic reaction to dyes (contrast agents) including GBCAs
<p>What are the possible side effects of Gadavist?</p> <ul style="list-style-type: none"> See “What is the most important information I should know about Gadavist?” Allergic reactions. Gadavist can cause allergic reactions that can sometimes be serious. Your healthcare provider will monitor you closely for symptoms of an allergic reaction. <p>The most common side effects of Gadavist include: headache, nausea, and dizziness. These are not all the possible side effects of Gadavist. Call your doctor for medical advice about side effects. You may report side effects to FDA at 1-800-FDA-1088.</p>
<p>General information about the safe and effective use of Gadavist. Medicines are sometimes prescribed for purposes other than those listed in a Medication Guide. You can ask your healthcare provider for information about Gadavist that is written for health professionals.</p>
<p>What are the ingredients in Gadavist? Active ingredient: gadobutrol Inactive ingredients: calcobutrol sodium, trometamol, hydrochloric acid (for pH adjustment) and water for injection Manufactured for Bayer HealthCare Pharmaceuticals Inc. Manufactured in Germany © 2011 Bayer HealthCare Pharmaceuticals Inc. All rights reserved. For more information, go to www.gadavist.com or call 1-888-842-2937.</p>

This Medication Guide has been approved by the U.S. Food and Drug Administration.

4/2018

Now that you know a little more about GADAVIST (gadolinium) and how dangerous it is, it is time to take a look at a famous U.S. actor's wife that lost weight (and almost her life) after some MRI's using gadolinium.....



Who hasn't heard of Chuck Norris? Chuck with his wife, Gena Norris.....



Action star Chuck Norris took on medical device manufacturers in a lawsuit filed in California on Wednesday alleging a chemical used in MRI imaging scans poisoned his wife.

Gadolinium that doctors injected into Gena Norris to improve the clarity of her MRIs have left her weak and tired and with debilitating bouts of pain and a burning sensation, the suit filed in San Francisco Superior Court says.

**CHUCK AND GENA NORRIS'S LAWSUIT FOR GADOLINIUM DAMAGE
INCLUDING WEIGHT LOSS (excerpt 1 of 2):**

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14 Attorneys for Plaintiffs
15 GENA NORRIS and CHUCK NORRIS,
16 also known as CARLOS RAY NORRIS

17 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**
18 **COUNTY OF SAN FRANCISCO**

19 GENA NORRIS and CHUCK NORRIS, also
20 known as CARLOS RAY NORRIS,

21 Plaintiffs,

22 vs.

23 McKESSON CORPORATION;
24 McKESSON MEDICAL-SURGICAL, INC.;
25 BRACCO DIAGNOSTICS, INC.; BRACCO
26 RESEARCH USA, INC.; BIPSO GMBH;
27 BRACCO IMAGING, S.P.A.; BRACCO
28 GROUP; BRACCO IMAGING GROUP;
TAKEDA GMBH; ACIST MEDICAL
SYSTEMS, INC., dba ACIST SILICON
VALLEY; MERRY X-RAY CHEMICAL
CORPORATION; and DOES 1 through 50,
inclusive,

Defendants.

**ENDORSED
FILED**
San Francisco County Superior Court

NOV 01 2017

CLERK OF THE COURT
BY: NEYL WEBB
Deputy Clerk

Case No. **CGC - 17 - 562228**

COMPLAINT FOR DAMAGES

- 1) STRICT LIABILITY: FAILURE TO WARN;
- 2) NEGLIGENCE;
- 3) FRAUD: MISREPRESENTATION;
- 4) FRAUD: CONCEALMENT, SUPPRESSION, OR OMISSION OF MATERIAL FACTS;
- 5) NEGLIGENT MISREPRESENTATION;
- 6) LOSS OF CONSORTIUM

DEMAND FOR JURY TRIAL

COME NOW Plaintiffs, GENA NORRIS and CHUCK NORRIS, also known as CARLOS RAY NORRIS ("CHUCK NORRIS") (hereinafter "Plaintiffs"), and allege as follows:

BACKGROUND AND INVOLVED PARTIES

1. Gena Norris and Chuck Norris are a celebrity couple whose battle with Gena's Gadolinium Deposition Disease, and their concerns with the dangers of the gadolinium-based

CHUCK AND GENA NORRIS'S LAWSUIT FOR GADOLINIUM DAMAGE INCLUDING WEIGHT LOSS (excerpt 2 of 2):

FACTS

46. Plaintiff Gena Norris had normal kidney function prior to developing Gadolinium Deposition Disease ("GDD"). Plaintiff Gena Norris was subjected to several MRIs. At the time of these procedures, Plaintiff was injected with the gadolinium-based contrast agents ProHance and MultiHance. Unbeknownst to her, she developed GDD soon thereafter. Plaintiff Gena Norris'

-9-

COMPLAINT FOR DAMAGES AND DEMAND FOR JURY TRIAL

symptoms of GDD included, but were not limited to, the following: burning pain in abdomen and throughout her body; violent shaking; tremors; clouded mentation; confusion; weakness; fatigue; hypoglycemia; difficult, painful movement; low body temperature; inflammation, especially throughout her lymphatic system; fasciculation; muscle cramps; numbness; tingling sensation; aching joints; weight loss; hair loss; lumps and rashes on body; kidney damage; and osteoporosis.

47. Plaintiff Gena Norris was hospitalized numerous times when she suffered multiple, debilitating bouts of pain and burning throughout her body following the MRIs and resulting gadolinium poisoning. Long term effects of her GDD include cognitive deficits; body pain and burning; kidney damage; loss of energy and mobility; and difficulty breathing due to damage to her ribs.

Paragraph 46: “weight loss”, but also look at her other issues due to gadolinium poisoning such as “violent shaking” and “tremors”, symptoms which someone else might confuse with seizures. She also had the same things Y.L. had including “weakness”, “fatigue”, and “difficult, painful movement”.

very closely I have been poisoned with gadolinium or by gadolinium and we



FULL MEASURE: June 11, 2017 - Fighting For Her Life

59,997 views • Jun 12, 2017

293 6 SHARE SAVE ...



Full Measure with Sharyl Attkisson

SUBSCRIBE

Source:

(<https://www.youtube.com/watch?v=tZqwvlmDL84>)

Gena Norris interview on YouTube:

“I have been poisoned with gadolinium or by gadolinium”

We, the parents, know UMC poisoned our son, Y.L. with GADAVIST which contained gadolinium. THIS POSITIVELY AFFECTED HIS ABILITY TO EAT AND DRINK AND SWALLOW PROPERLY WHICH HAD A DIRECT CONNECTION TO HIS WEIGHT LOSS. Y.L. was carried out of UMC on the evening of Saturday, January 26th, 2019. UMC LIED ON THE OFFICIAL RECORD STATING HIS DISCHARGE CONDITION WAS ‘GOOD’. UMC DOCTORS ARE GROSSLY NEGLIGENT AND SHALL BE HELD ACCOUNTABLE. BOULDER CITY DETECTIVE SLACK HAS THE VIDEO PROOF Y.L. BEING CARRIED OUT OF UMC. THIS VIDEO is proof Y.L. was not released in good condition from UMC.



FULL MEASURE: June 11, 2017 - Fighting For Her Life

59,997 views • Jun 12, 2017

294

6

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...



Full Measure with Sheryl Attkisson

Pages

SUBSCRIBE

Source:

(<https://www.youtube.com/watch?v=tZqwvlmDL84>)

Sheryl Attkisson on YouTube interviewing Gena and Chuck Norris:

“A lot of people getting very sick didn't have kidney issues, Gena was one of them.”

(they misspelled her name on the closed captioning)

We, the parents:

Y.L. was not sick and autistic like before the MRI. The night before the MRI Y.L. was able to move/stand on his own, although he was not able to speak. It was positively the GADOLINIUM IN THE GADAVIST INJECTION THAT SENT EASON OFF THE PROVERBIAL CLIFF. He was NOT the same boy AFTER THE MRI as he had all the appearances of a full blown autistic vegetable.

To get a better idea of why Gena Norris (and Eason) lost weight, one needs to look no further than the following interview on YouTube with Gena Norris:
Source: <https://www.youtube.com/watch?v=VS-08qt6HAg>

YouTube

gadolinium - Gena Norris

breathe from my abdomen my left arm is completely drawn up like this



MEDICAL NIGHTMARE: Chuck Norris's wife Gena talks about the medical nightmare she has gone through

44,841 views • Nov 2, 2017

KPIX CBS SF Bay Area
141K subscribers

Chuck Norris's wife Gena talks about the medical nightmare she has gone through

411 30 SHARE SAVE ...

SUBSCRIBE

Gena Norris:

“I breathe from my abdomen. My left arm is completely drawn up like this. I can no longer swallow and so they’re having to boil my food just so I can get enough nutrition so I can eat.”
(GENA NORRIS IS REFERRING TO THE MEDICAL STAFF IN A PRIVATE MEDICAL CENTER, NOT HOSPITAL, IN RENO, NEVADA THAT CHUCK NORRIS TOOK HER TO)




SO, look at Gena above depicting how her arm was drawn up, abnormally. Now, look at Y.L. to the left. **Does his hand posture look normal to you?** It DOES NOT TO US, THE PARENTS, THAT KNOW THE CULPRIT WAS HEAVY METAL POISONING FROM THE GADAVIST.

Gena Norris went to **Sierra Integrative Medical Center in Reno, NV**, for FIVE MONTHS. Mostly receiving IV's. What were we doing as parents? Getting Eason a Myer's Cocktail IV that AFTER JUST ONE SESSION HAD HIM WALKING ON HIS OWN AGAIN. IT UNACCEPTABLE HOW CPS VIOLATED OUR RIGHTS TO HEAL OUR SON AS WE SAW FIT THAT WAS **SUPERIOR IN EVERY WAY HUMANLY POSSIBLE** TO GET OUR SON BACK TO NORMAL.



This is Y.L. receiving his Myer's Cocktail on the morning of Friday, February 1st, 2019. We were scheduled to return the following Monday, February 4th, 2019 at 10:00am for Y.L.'s ozone 10 Pass IV therapy session that was later criminally denied to us. As it was, the negligent doctors at UMC took a full nine (9) LONG DAYS just to come up with the diagnosis of viral encephalitis that Y.L. must have contracted at UMC. Also, UMC force fed our son GMO poison food (Pediasure 1.0) that further violated our parental rights for CLEAN FOOD. Then, through the chemical onslaught of Prednisone, Y.L. was chemically brought back to life WHEN WE THE PARENTS WOULD HAVE ACHIEVED A CLEAN AND HEALTHY RECOVERY HAD WE NOT BEEN VIOLATED BY CPS.



DR. HAZEL GOIS
Naturopathic Doctor

Date: February 1, 2019

Treatment Plan for Liu

Diet & Lifestyle:

- Incorporate greens daily via a raw juice, green smoothie, or incorporated into foods
- Apple Cider Vinegar 1 tsp daily
- Ginger Tea - add honey for sweetness to help warm up his stomach

Supplements:

- Theracurmin HP - Dissolve 1 opened capsule in water daily

Homeopathy

- Carbo Vegetabilis 30 C - Dissolve 2-5 granules under the tongue up to 4x per day

Hydrotherapy:

- Castor Oil Packs nightly until sx's resolve - This helps to enhance liver detox
- Sweat Therapy
 - If possible a sauna until your child starts to actively sweat
 - Active exercise to work up a sweat such as sports, martial arts, rebounding (trampoline)
- Essential Oils to Aid Detox
 - Use a diffuser with the child in the same room to aid detox
 - For direct detox, dilute the essential oil 1:4 with a carrier oil such as sweet almond oil or fractionated coconut oil and apply directly to the feet or the abdomen
 - Essential oils: Rosemary, Cilantro, Juniper Berry, Geranium, Clove, Thyme & Lemongrass (choose an oil that the child enjoys the smell of)

Consider:

- Hyperbaric oxygen therapy
 - Desert Oasis Clinic, 702-310-9350, <http://bit.ly/2S3IRKT>

Return to Clinic on Monday for Single-Pass Ozone Therapy

Look to the left at Dr. Gois's treatment plan. Near the bottom it says for us to consider Hyperbaric oxygen therapy at the Desert Oasis Clinic which we were planning to do **IN ADDITION TO** the Monday, Feb 4th, 2019 "Single-Pass Ozone Therapy IV" at the bottom to which we would have added 9 additional "passes" of ozone for what is called 10 Pass. We were also planning to do additional Myer's Cocktail IV's to speed up Eason's recovery and to ensure he stayed properly hydrated. **CHUCK NORRIS DID NOT RETURN TO ANY HOSPITAL TO SAVE HIS WIFE, HE HAD TO GO TO A PRIVATE CLINIC OTHERWISE HIS WIFE WOULD HAVE DIED. WE BELIEVED THE SAME TO BE TRUE WITH OUR SON.**

(Source: <https://www.youtube.com/watch?v=0HdVNi7SKuc>)

YouTube

gadolinium Gena Norris hyperbaric oxygen chamber



FULL MEASURE: April 15, 2018 - MRI Changes

2,582 views • Apr 16, 2018

65 2 SHARE SAVE ...

FULL MEASURE
with Sharyl Attkisson
18.3K subscribers

SUBSCRIBE

What do you see Gena Norris standing next to? It's a **HYPERBARIC OXYGEN CHAMBER** that Chuck Norris bought for his wife that is **IN THEIR OWN HOME** TO HEAL Gena. Why is this important? **Because hyperbaric oxygen chambers and ozone IV therapy are closely related.** BOTH put MORE OXYGEN into the body TO HEAL THE BODY. Look again on the previous page. NOT ONLY WERE WE ALREADY SCHEDULED FOR OZONE 10 PASS IV THERAPY with Y.L. at the Renaissance Health Centre, we were ALSO READY, WILLING, AND ABLE TO TAKE Y.L. TO THE DESERT OASIS CLINIC FOR HYPERBARIC OXYGEN THERAPY TO SPEED UP HIS HEALING. Notice what was NOT SAID..... we were NOT interested in the ABSOLUTELY FLAWED METHODOLOGY OF WESTERN MEDICINE THAT SOLELY DICTATES "TREATMENT OF SYMPTOMS" at the expense of our son's health with poisonous drugs. Hyperbaric oxygen and ozone IV ARE BOTH FORMS OF OXYGEN HEALING. The primary difference between the two modalities is the amount of oxygen that enters the body. Ozone is 3 molecules of oxygen, while hyperbaric oxygen is 2 molecules of oxygen under pressure. CHUCK NORRIS SPENT OVER 2 MILLION DOLLARS TO HEAL HIS WIFE. **We knew how to heal Y.L. for a fraction of that amount because we have studied alternative healing for over 20 years.**



full measure fighting for her life



FULL MEASURE: June 11, 2017 - Fighting For Her Life

60,074 views • Jun 12, 2017

295

6

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...



Full Measure with Sharyl Attkisson

SUBSCRIBE

Sharyl Attkisson narrating:

“Gena says getting better has meant everything from **seeing specialists in China** to getting oxygen therapy in a Hyperbaric Chamber. They even bought one to have it close by.”

Gena Norris comments after Sharyl Attkisson:

“In this machine (see page 25) alone I’ve done probably about 100 dives. We call them dives, **just to help heal my brain.**”

So, when Chuck Norris takes his wife who is suffering from gadolinium poisoning to a private clinic in Reno, Nevada, and to specialists in China, and spends over \$2 million dollars to heal her that is okay. But if Austin and Yuxia take Y.L. to a naturopathic doctor/clinic near Summerlin for alternative care (that should be the mainstream) for similar treatment that Mr. Norris did for his wife, somehow, we, the parents, are felons?

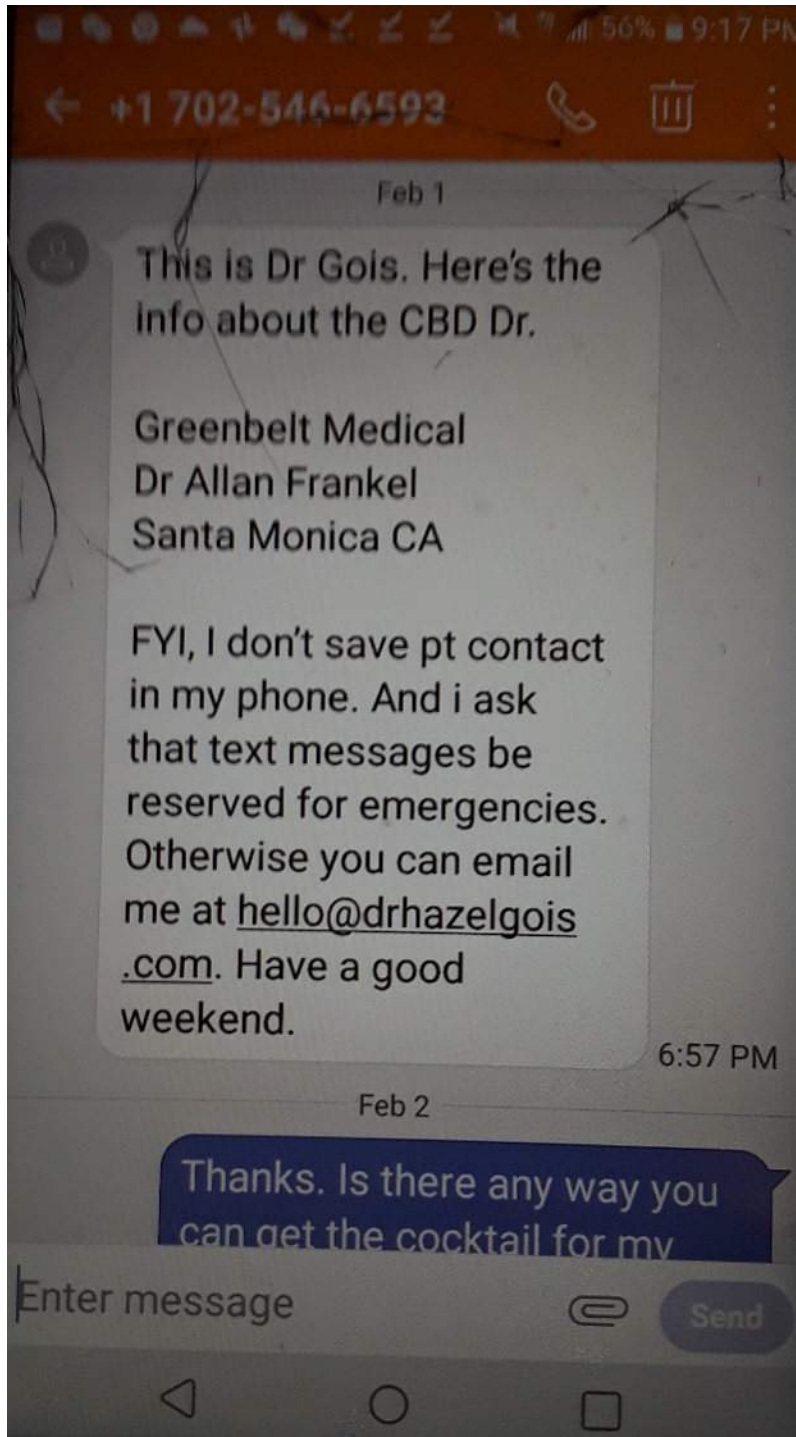
This is called medical tyranny and this WILL NOT STAND. NOT NOW. NOT EVER.

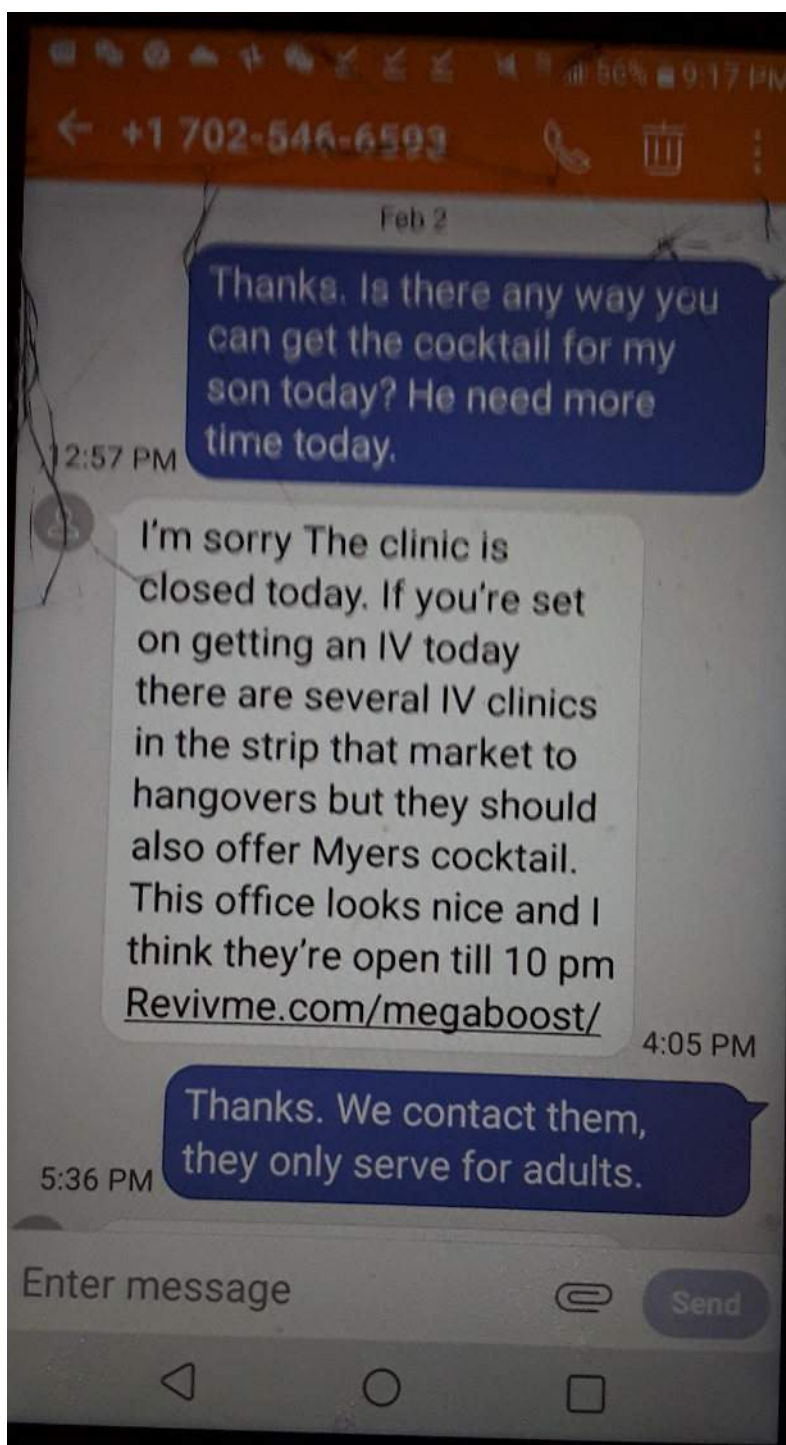
On the Sunday evening that CPS kidnapped Eason back to UMC, we were mere hours away from taking Y.L. back to Renaissance Health Centre for ozone IV therapy and additional Myer's Cocktail IV's. The ozone would have breathed new life into Y.L. paving the **NATURAL WAY** to his recovery.

The **ONLY** reason Y.L. was able to make a recovery after being kidnapped back to UMC is because of the detox protocol the parents followed to clean **MOST** of the heavy metals out of Y.L. using Dr. Patrick Flanagan's MegaHydrate and Crystal Energy. In addition to this, we had Y.L. on our \$3K+ MRS2000 full body mat and we had Y.L. on Dr. Robert Morse's herbal liquid botanicals. Dr. Morse has been **HEALING** people for over 40 years. Western doctors are **NOT** trained how to heal anyone and if they did, they'd get their license pulled by the AMA. They are solely in the **UNETHICAL BUSINESS OF SICK CARE MANAGEMENT**.

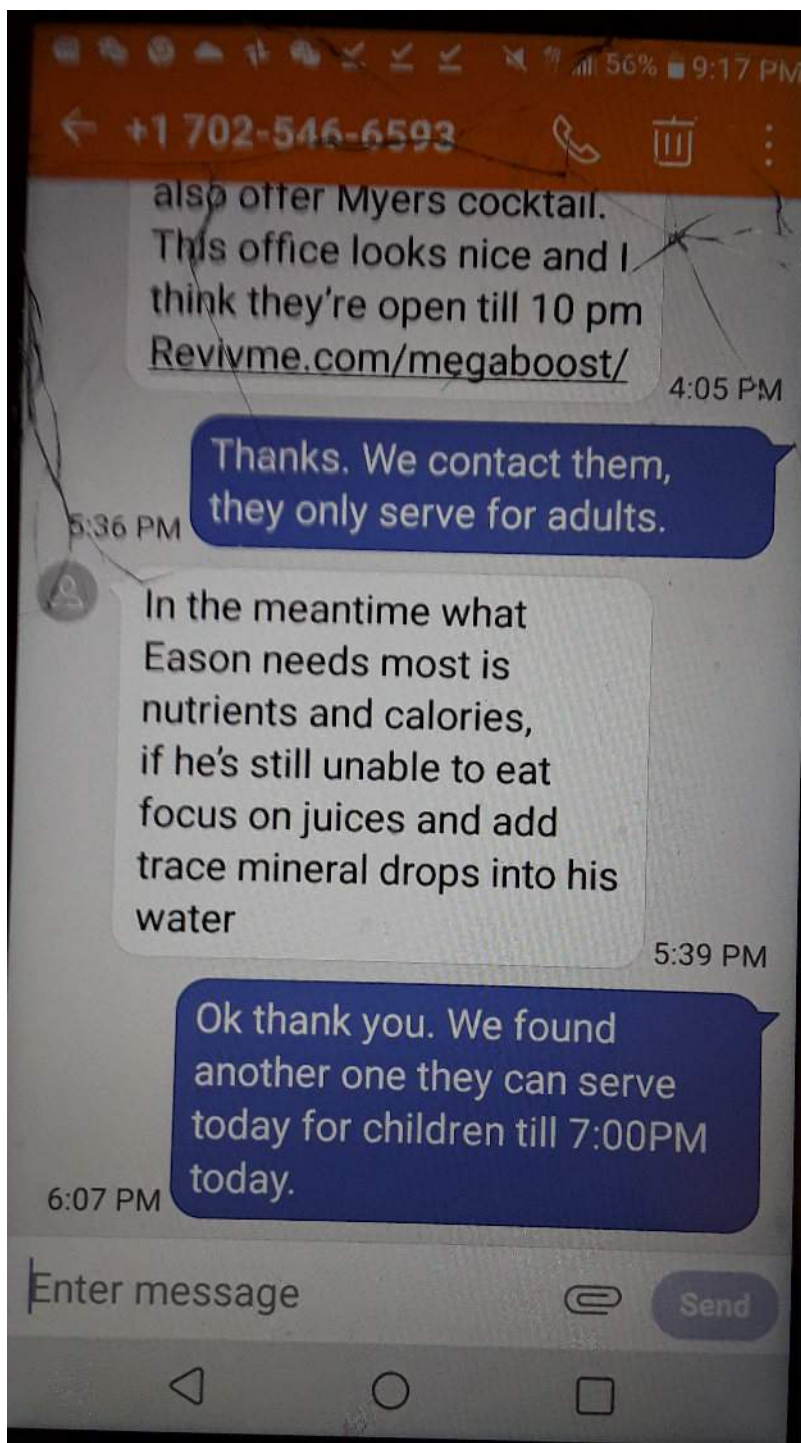
To force us, the parents, into a crooked system of treating symptoms while ignoring Chinese medicine and naturopathic medicine is **COERCION AND IS ILLEGAL**.

The following screenshots are taken directly from Cici's cell phone of the dialog BETWEEN Cici and Dr. Hazel Gois, Eason's naturopathic doctor. This dialog begins on the afternoon of Friday, February 1st, 2019, just hours after our first visit and ends on the afternoon of Saturday, February 2nd, 2019:





LOOK AT WHAT DR GOIS WROTE TO US? SHE IS TELLING US IF WE WANT Y.L. TO GET ANOTHER MYER'S COCKTAIL IN THE INTERIM (BEFORE RETURNING TO HER OFFICE ON MONDAY) THAT WE COULD TAKE Y.L. TO A "HANGOVER" IV CLINIC NEAR THE LAS VEGAS STRIP. **LET THIS TEXT MESSAGE FOREVER PUT TO REST ALL THE DENIGRATING COMMENTS BY THE CPS ACCUSERS.** WE WERE SIMPLY FOLLOWING THE GUIDANCE OF OUR DOCTOR. THAT IS NOT ILLEGAL. THIS DOES NOT MAKE US CRIMINAL FELONS. IT SHOWS THAT WE WANTED THE BEST FOR Y.L. AND WE DIDN'T FEEL LIKE WAITING FOR HER OFFICE TO REOPEN ON MONDAY.



THIS NEXT TEXT BY DR. GOIS IS CRITICAL TO OUR DEFENSE BECAUSE DR. GOIS, AS OUR DOCTOR, WAS FULLY AWARE THAT EASON WAS HAVING DIFFICULTIES EATING:

“if he’s still unable to eat focus on juices and add trace mineral drops into his water”

WE WERE FOLLOWING OUR DOCTORS ORDERS. THIS DOES NOT MAKE US CRIMINALS OR FELONS.

Dr. Gois KNEW we were returning to her office on Monday for a SUPER IMPORTANT TREATMENT, THAT OF THE OZONE 10 PASS IV THERAPY.

All of this was interrupted by the callous Jeremy Batten at the IV Therapy Clinic who called CPS on us KNOWING FULL WELL WE WERE ALREADY UNDER THE CARE OF A DOCTOR AND HE COMPLETELY BROKE NEVADA LAW BECAUSE NRS 200.5085 DOES NOT MAKE IT A CRIME TO OBTAIN ‘ALTERNATIVE’ CARE. He shall be held responsible for violating our rights.

Dr. Gois's PROGRESS NOTES from the Original Discovery Docs (page 1 of 4)

PT Name: Yichen "Eason" Liu
DOB: 10/19/2010 (8 yo)
CC: Seizures (G40.309),

PROGRESS NOTES

ce:

S:

HPI

- Child has been unresponsive since Seizure in Jan 20th
 - Due to fever from dumplings w/ MSG, had a fever then a seizure the next morning
 - Has not been the same since
 - Before seizure child was very active,
 - Still unable to talk normally before discharge
 - After discharge was unable to drink normally, must drink via droppers
- Went to St Rose Sienna, then sent to UMC, was discharged last Saturday Evening
 - Book - The battle for health is Ph
 - When step-father saw his son on Friday, he jumped into his lap and had incontinence
 - On Saturday after the MRI he was discharged told he was normal and would be able to go to school on Feb 4th.
 - After discharge, he became unresponsive, has had incontinence, is unable to eat solid foods, only takes water from a dropper and dribbles it
- GI - no solid foods only liquids
- Bowel movements - Every day bowel movements
- Urination - now incontinent & using diapers
- Son lost weight since treatment, he has been unable to eat solid foods
- Before this played computer games

PMx

- PCP:
- Last Labs:
- Hospitalizations/Surgeries:
- Diagnoses:
- Supplements:
 - MegaHydrate by Dr. Patrick Flannigan
 - Crystal Energy
 - These led to a bowel movement
 - CBD
 - Charlotte's Web Hemp Extract in Coconut Oil
 - Source Hemp Oil
 - Cayenne Tincture
 - Food-Grade Hydrogen Peroxide
 - Dr. Morse's Herbal Health Club
 - St & Bowel #2
 - Endocrine Balance
 - Lymphatic System Tonic
 - KD & BL Tonic 1
 - Brain & Nervous System Tonic 2 Glycerin
 - Brain & Nervous System Tonic
 - Healthy Circulation - Upper Body
 - Spasm Calm
 - Natural Calm & small amounts of baking soda

FHx

- F: Healthy, family heart disease
- M: 41 yo Healthy, MGF blood cancer

SHx

- Lives with mother and step-father

SEAMMS

Page 1 of 4

Dr. Gois: "Son lost weight since treatment, he has been unable to eat solid foods"

So, Dr. Gois was **FULLY AWARE** that Eason lost weight. As a doctor, she also **KNEW** with the services we receiving, that **SHE WOULD BE ABLE TO CORRECT THIS IN DUE TIME**. UMC turned our boy into a vegetable in 6 short days. We were going to need some time to reverse **ALL THE DAMAGE CAUSED BY THEM**. It was going to take more than 1 visit to her office **WHICH IS NOT A CRIME**. **IT'S UNACCEPTABLE FOR UMC CHILDREN'S HOSPITAL DOCTORS TO ATTEMPT TO GET AWAY WITH BLATANT MALPRACTICE.**

Dr. Gois's PROGRESS NOTES from the Original Discovery Docs (page 2 of 4)

PT Name: Yichen "Eason" Liu

DOB: 10/19/2010 (8 yo)

CC: Seizures (G40.309),

PROGRESS NOTES

- Stress: 9/10 (10 worst)
- Energy: 1/10 (10 best)
- Appetite: 0
- Mood: Many
- Sleep - 7/10 (10 best) - past 2 night slept well 5-6 hrs

Lifestyle

- Diet - Before sickness - rice, soup, apples, watermelon, balanced diet, no processed foods
- Liquids
 - Soda: None
- Exercise
 - Used to play and be an active child
- Bowel Movements

ROS

- Pt's father did not fill out ROS

O:

Vitals

- Ht:
- Wt: 40 - lbs (191 lbs carried by father)
- BP: Cuff was not small enough

Physical Exam

- General: Pt is underweight, appears emaciated
- Head: Normal hair thickness, no lesions
- Eyes: PERRLA, pt is unable to maintain eye contact
- Nose: No abnormalities of external nose, mucus was dripping
- Mouth & Throat: Lips intact
- External Neck: No LAD, no thyromegaly, no lesions, NTTP, no stiffness, trachea midline
- Respiratory: Difficult to auscultate dt noise from phlegm in sinuses, normal breathing effort
- CV: RRR, S1 & S2 present
- Abdomen: BS4Q, normal contour, no organomegaly
- Back: No scoliosis, lordosis or kyphosis, vertebrae is very visible.
- Extremities: Finger joints mobile
- Skin: No lesions, normal nails, normal texture

IV Myers'

- Ingredients:
 - MgCl: 3 ml
 - CaGluc: 2 ml
 - Pyridoxine: 1 ml
 - Dexpanthenol: 1 ml
 - Methocobalamin: 1 ml
 - B Complex 100: 1 ml
 - Vitamin C 20,000mg/50ml: 10 ml
 - Sterile Water: 250 ml
- Insertion Site: L radial vein on 1st attempt by Dr. Pfau
- Notes: Pt TTW

A:

8 yo M PTC w/ CC of Autism-like disorder since an MRI when he was at UMC dt a fever and seizure possibly caused by Maltodextrin (MSG). Pt was mostly unresponsive in office. Pt has no bowel control and would only take water from a dropper. Pt often dribbled the water. Pt appears to have experienced some type of brain damage from either the seizure or the medications administered in the hospital. Treatment goal is to facilitate all forms of detox in the body and to increase nutrient intake. Pt responded well to the Myers'

Page 2 of 4

UNDER "Physical Exam" above.....

Dr. Gois: "Pt (patient) is underweight, appears emaciated"

Why is this important? BECAUSE OUR DOCTOR WAS **FULLY AWARE** OF EASON'S WEIGHT LOSS! DR. GOIS IS IN THE BUSINESS OF HEALING THROUGH NATURAL MEANS AND IN THE COURSE OF HEALING EASON WOULD HAVE GAINED THE WEIGHT BACK.

Dr. Gois's PROGRESS NOTES from the Original Discovery Docs (page 3 of 4)

PT Name: Yichen "Eason" Liu
DOB: 10/19/2010 (8 yo)
CC: Seizures (G40.309),

PROGRESS NOTES

Cocktail, he was animated though difficult to understand and he was attempting to walk around the office with his mother's support.

P:

Diet & Lifestyle:

- Incorporate greens daily via a raw juice, green smoothie, or incorporated into foods
- Apple Cider Vinegar 1 tsp daily
- Ginger Tea - add honey for sweetness to help warm up his stomach

Supplements:

- Theracurmin HP - Dissolve 1 opened capsule in water daily

Homeopathy

- Carbo Vegetabilis 30 C - Dissolve 2-5 granules under the tongue up to 4x per day

Hydrotherapy:

- Castor Oil Packs nightly until sxs resolve - This helps to enhance liver detox
- Sweat Therapy
 - If possible a sauna until your child starts to actively sweat
 - Active exercise to work up a sweat such as sports, martial arts, rebounding (trampoline)
- Essential Oils to Aid Detox
 - Use a diffuser with the child in the same room to aid detox
 - For direct detox, dilute the essential oil 1:4 with a carrier oil such as sweet almond oil or fractionated coconut oil and apply directly to the feet or the abdomen
 - Essential oils: Rosemary, Cilantro, Juniper Berry, Geranium, Clove, Thyme & Lemongrass (chose an oil that the child enjoys the smell of)

Consider:

- Hyperbaric oxygen therapy
 - Desert Oasis Clinic, 702-310-9350, <http://bit.ly/2S3IRKT>

Return to Clinic on Monday for Single-Pass Ozone Therapy

Hazel Gois, N.D.

Hazel Gois, N.D.
February 1, 2019

Date: 2/2/2019

Pt Txt Message: Pt's step-father requested a Myers' Cocktail for Eason saying that he needs it again. Step-father stated that he responded well to the initial treatment. As our office was closed I referred pt to an IV clinic along the strip. Pt's father found a clinic that accepts pediatrics for a Myers.

I recommend admittance to a children's hospital if no improvement.

FROM THE PREVIOUS PAGE, BOTTOM PARAGRAPH:

"Treatment goal is to facilitate all forms of detox in the body and to increase nutrient intake."

DR. GOIS IS STATING FOR THE RECORD SHE RECOGNIZED THAT EASON HAD TOXINS IN HIS BODY THAT NEEDED TO COME OUT. WHERE DID ALL THOSE TOXINS COME FROM? FROM UMC CHILDREN'S HOSPITAL DOCTORS. EVERY MEDICAL MATERIAL FACT IS PAINSTAKINGLY DETAILED IN THE 1/26/2020 "JOINT DECLARATION OF KIMBALL AUSTIN SACHS AND YUXIA ZHANG".

Dr. Gois's PROGRESS NOTES from the Original Discovery Docs (page 4 of 4)

PT Name: Yichen "Eason" Liu
DOB: 10/19/2010 (8 yo)
CC: Seizures (G40.309).

PROGRESS NOTES

Date: 2/4/2019

Pt Phone Call: Pt's step-father reported that Child Protective Services took Eason in the middle of Sunday night to UMC. Pt left voicemail requesting help to get the child back to follow my protocol. I told Austin (step-father) over the phone that as a 3rd party we cannot interfere with Child Protective Services.

It appears, if we, the parents, don't listen to the negligent western doctors, that AUTOMATICALLY gives the criminal child kidnapping organization called CPS the pretext to steal your child. But if the parents are following the law (NRS 200.5085) and seeking intelligent and natural and safe remedies from their own naturopathic doctor, there is no entity that respects and follows that same rule of law. NOT THE SHERIFF OF CLARK COUNTY. NOT THE GOVERNOR OF NEVADA. NOT THE OMBUDSMAN OF THE LOCAL CPS. WE KNOW THIS TO BE TRUE BECAUSE WE CALLED ALL THESE ENTITIES THAT DID NOTHING TO HELP ENFORCE EXISTING LAWS.

A SERIOUS CRIME HAS BEEN COMMITTED HERE:

CPS kidnapped our son illegally and by doing so VIOLATED THE DETOX/HEALING PROTOCOLS OF DR. GOIS. WE, THE PARENTS, MAINTAIN CPS IS GUILTY OF HIGH CRIMES AND SHALL BE HELD ACCOUNTABLE FOR THEIR ACTIONS.

This is another lawsuit against a manufacturer of gadolinium and weight loss.

Source: <https://aboutlawsuits-wpengine.netdna-ssl.com/wp-content/uploads/2018-06-08-complaint.pdf>

Case 2:18-cv-01778-JJT Document 1 Filed 06/08/18 Page 1 of 16

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Attorneys for the Plaintiff SUSAN FISCHER

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

SUSAN FISCHER,

Plaintiff,

vs.

BAYER HEALTHCARE
PHARMACEUTICALS, INC.; BAYER
CORPORATION; BAYER HEALTHCARE
LLC; BRACCO DIAGNOSTICS, INC.;
GUERBET, LLC; MALLINCKRODT INC.;
MALLINCKRODT LLC; and LIEBEL
FLARSHEIM COMPANY LLC,

Defendants.

Case No.

COMPLAINT FOR DAMAGES

1. STRICT LIABILITY: FAILURE TO WARN;
2. NEGLIGENCE

COMES NOW Plaintiff, SUSAN FISCHER (hereinafter "Plaintiff"), and alleges as follows:

PARTIES

1. Plaintiff Susan Fischer is a resident of Scottsdale, Arizona. She was administered Gadolinium-Based Contrast Agents ("GBCAs") called Magnevist, MultiHance, and Optimark
2. Plaintiff Susan Fischer suffers from Gadolinium Deposition Disease ("GDD"). GDD is an incurable, painful disease. Plaintiff contracted GDD as a result of receiving MRIs and MRAs using intravenous injections of Magnevist, MultiHance, and Optimark.

-1-

Case 2:18-cv-01778-JJT Document 1 Filed 06/08/18 Page 6 of 16

of these procedures, Plaintiff was injected with the gadolinium-based contrast agent MultiHance. Unbeknownst to her, she developed GDD soon thereafter. Plaintiff Susan Fischer's symptoms of GDD included, but were not limited to the following: burning sensation; violent shaking; tremors; clouded mentation; confusion; weakness; fatigue; hypoglycemia; difficult, painful movement; low body temperature; inflammation, especially throughout her lymphatic system; muscle cramps; numbness; tingling sensation; aching joints; weight loss; hair loss; lumps and rashes on body, kidney damage; and osteoporosis.

17. Gadolinium Deposition Disease ("GDD") is the name for a disease process observed in people with normal or near-normal renal function who develop persistent symptoms that arise hours to months after the administration of gadolinium-based contrast agents. In these cases, no preexistent disease or subsequently developed disease of an alternate known process is present to account for the symptoms. People suffering from GDD experience symptoms consistent with the known toxic effects of retained gadolinium. Typical clinical features of GDD include persistent headaches, bone and joint pain, and clouded mental activity. People with GDD often experience subcutaneous soft-tissue thickening that clinically appears somewhat spongy or rubbery. Tendons and ligaments in a comparable distribution may also be painful and have a thickened appearance. People with GDD often experience excruciating pain, typically in a distal distribution, of the arms and legs but may also be in the torso or generalized in location. This pain is often described as feeling like sharp pins and needles, cutting, or burning. GDD often progresses to painful inhibition of the ability to use the arms, legs, hands, feet, and other joints. GDD is a progressive disease for which there is no known cure.

18. GDD is a man-made disease. It only occurs in patients who have received a gadolinium-based contrast agent for an MRI or an MRA.

19. Gadolinium is a highly toxic heavy metal. It does not occur naturally in the human body. The only known route for gadolinium to enter the human body is injection of a gadolinium-based contrast agent.

20. Because gadolinium is toxic, it must be coated to keep it from coming into contact with human tissue when used in connection with MRIs or MRAs. This coating process is called

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Look at Paragraph 16 above for Susan Fischer's lawsuit against Bayer for gadolinium: "weight loss", plus "muscle cramps", and "aching joints".

Is this document not enough to convince ANY reasonable and prudent man or woman the obvious? If you inject a deadly liquid metal, gadavist (gadolinium), into the human body, you run the risk of serious health repercussions. The data is here. The facts are here. The evidence is here. The proof is here. The TRUTH is here. TRUTH does NOT fear investigation!



theaustinpowers <kaustinsachs@gmail.com>

Request for telephonic meeting....

8 messages

theaustinpowers <kaustinsachs@gmail.com>

Tue, Aug 1, 2023 at 8:16 PM

To: dena.rinetti@clarkcountyda.com

Bcc: theaustinpowers <kaustinsachs@gmail.com>, 张育霞 <cicyzhangyu@gmail.com>

Ms. Rinetti,

My wife and I are requesting to speak to you directly on the phone at your earliest convenience regarding our cases (C-19-343540-1 & C-19-343540-2).

Please provide a date and time (Pacific Daylight Time) that we may call you directly and for you, obviously, to provide your direct telephone number.

Thank you.

Mr. Sachs and Ms. Zhang

theaustinpowers <kaustinsachs@gmail.com>

Fri, Aug 4, 2023 at 10:00 AM

To: dena.rinetti@clarkcountyda.com

Bcc: theaustinpowers <kaustinsachs@gmail.com>, 张育霞 <cicyzhangyu@gmail.com>

Following up, thank you.

[Quoted text hidden]

theaustinpowers <kaustinsachs@gmail.com>

Fri, Aug 11, 2023 at 12:37 AM

To: dena.rinetti@clarkcountyda.com

Bcc: theaustinpowers <kaustinsachs@gmail.com>, 张育霞 <cicyzhangyu@gmail.com>

Following up for the **SECOND TIME**. Thank you.

[Quoted text hidden]

Dena Rinetti <Dena.Rinetti@clarkcountyda.com>

Mon, Aug 14, 2023 at 5:40 PM

To: theaustinpowers <kaustinsachs@gmail.com>

EXHIBIT B

I am happy to discuss the case with you via email.

From: theaustinpowers <kaustinsachs@gmail.com>
Sent: Thursday, August 10, 2023 10:37 PM
To: Dena Rinetti <Dena.Rinetti@clarkcountyda.com>
Subject: Re: Request for telephonic meeting....

CAUTION: This email originated from an **External Source**. Please **use caution** before opening attachments, clicking links, or responding to this email. **Do not sign-in with your DA account credentials.**

[Quoted text hidden]

theaustinpowers <kaustinsachs@gmail.com>
To: Dena Rinetti <Dena.Rinetti@clarkcountyda.com>
Bcc: theaustinpowers <kaustinsachs@gmail.com>, 张育霞 <cicyzhangyu@gmail.com>

Mon, Aug 14, 2023 at 7:14 PM

Ms. Rinetti,

Thank you for your offer.

A few questions....

- 1) Have you read our 195 page JOINT DECLARATION OF KIMBALL AUSTIN SACHS AND YUXIA ZHANG with 90 EXHIBITS in its entirety? If not, why not?
- 2) If yes, have you assigned one of your investigators to investigate the truthful claims we made regarding the dangers of the gadolinium (element #64) in the MRI contrast dye our son was clearly debilitated by? If not, why not?
- 3) Have you read my 6/24/2021 AFFIDAVIT OF FACT in its entirety to include the 35 page EXHIBIT A that covers in great detail the known dangers of gadolinium? If not, why not?
- 4) Do you understand that the video surveillance that detective Slack obtained from UMC Children's Hospital and is part of the provided discovery, clearly shows our son was not released in "good" condition as the lying doctors put on our son's medical records? If not, why not?
- 5) Do you understand that detective Slack never conducted anything that even remotely resembled a respectable "investigation" of the facts (reference the 6/24/2021 AFFIDAVIT)? If not, why not?
- 6) Do you understand that Ms. Jobe committed serious prosecutorial misconduct (not revealing even a fraction of the exculpatory evidence that existed, assuming facts not evidence, allowing perjured testimony) at the September 2019 grand jury that was carefully documented in my 6/24/2021 AFFIDAVIT? Do you further understand that, to date, Ms. Jobe has not rebutted (under penalty of perjury) what I've stated under penalty of perjury, therefore by her silent tacit acquiescence, she agrees that she has, in fact committed prosecutorial misconduct? Do you further understand by virtue of the OPPOSITION you filed this morning by quoting her fraudulent grand jury testimony that you are aiding and abetting in Ms. Jobe's fraud and that you shall be held accountable just as she will? If not, why not?
- 7) Do you understand that you have no competent fact witnesses to any child neglect/abuse? If not, why not?
- 8) Do you understand regarding count 1 that you have no competent fact witnesses to prove anything beyond a reasonable doubt? If not, why not?
- 9) Do you understand regarding count 2 that there isn't a single NRS that dictates parents MUST bow down to/submit to the dictates of western doctors that know nothing about healing nor did we have to give our son the chemical poisons they said we had to? If not, why not?
- 10) Do you understand that western doctors are only trained to "treat symptoms" with chemicals they call drugs that include a lot of side effects, some life threatening? If not, why not?
- 11) Do you understand that NRS 126.036 and NRS 200.5085 and the 2 Nevada NRS's regarding informed consent negate any/all of the false charges that you maintain against my wife and I? If not, why not?
- 12) Do you understand regarding count 3 that it isn't against the law to leave your son safely at home to pay the bail bondsman? Do you further understand there are only, currently, 3 U.S. states that SPECIFICALLY prohibit parents from leaving their child at home, Maryland, Oregon, and Illinois? Do you further understand per the equal protection

clause of the constitution that we cannot be held to imaginary crimes that don't even exist in Nevada? If not, why not?

13) Where is the evidence on the existing court record here and now, and not theoretically, that **you** have provided this color of law corporation doing business as the Eighth Judicial District Court factual evidence it has in personam jurisdiction over me, the natural man?

14) Do you understand the NRS's you cited in your OPPOSITION this morning make reference to a "person"? Do you understand that I don't consent to being a "person"? Do you understand that I don't agree to be a "person"? Do you understand it is against my will to be called a "person"? Do you understand that I shall put on the record that I rebut any and all presumptions that I am a "person"?

15) Please fully disclose, under penalty of perjury in the form of an Affidavit that is notarized, what is your financial interest in this case?

16) Do you understand that I am keeping arguably one of the most detailed accounts/records of all the fraud that everyone in this case has committed including yourself? If not, why not?

17) Do you understand with zero competent fact witnesses you have zero chances of proving ANYTHING beyond a reasonable doubt to 12 jurors? If not, why not?

18) Do you understand that my wife and I love our son and did everything we could to SAVE his life in SPITE of western doctors that throw dangerous chemicals at everything? If not, why not?

19) Do you understand we have documented expenses totaling over \$1,100 dollars to help heal our son safely and effectively after he was discharged from UMC Children's Hospital? Do you further understand that Dr. Terry Pfau told the detectives when asked why he didn't call for an ambulance when my wife and I brought him to Renaissance Health Centre, he responded "he looked stable"? Who got our son "stable" per a medical doctor? We did. Do you further understand that our son started walking again and came back to "life" so to speak after Dr. Pfau administered just one Myer's Cocktail IV? Do you further understand that Dr. Gois, my wife, and I all witnessed this? If not, why not?

20) Do you REALLY believe in your heart that if a children's hospital kills a child that the doctors give a damn? If not, why not?

21) If you are a parent, would you want the "State" or western doctors to dictate to you to take away your parental rights to medical choices in spite of the fact that there are many other SAFE and EFFECTIVE modalities that exist to include Chinese Traditional Medicine and Naturopathic Medicine? Where is it written/codified into LAW, and not a statute, that western medicine is the only CHOICE informed parents have when it comes to the medical decisions for their children? If that were the case, wouldn't that be an unlawful monopoly? If not, why not?

Ms. Rinetti, please look at yourself in the mirror, and ask God, "God, will you please forgive me for all the hell I've put Mr. Sachs and his wife through?"

Please provide your written and thoughtful and complete answers in a reasonable amount of time, say, 3 business days from today, Monday, August 14, 2023.

Thank you.

Mr. Sachs

[Quoted text hidden]

Dena Rinetti <Dena.Rinetti@clarkcountyda.com>
To: theaustinpowers <kaustinsachs@gmail.com>

Wed, Aug 16, 2023 at 12:58 PM

Sir,

This is just argument. Please see the provided discovery.

[Quoted text hidden]

theaustinpowers <kaustinsachs@gmail.com>

Sun, Aug 4, 2024 at 11:23 AM

To: Dena Rinetti <dena.rinetti@clarkcountyda.com>

Cc: carrie.Buck@sen.state.nv.us, nicole.Cannizzaro@sen.state.nv.us, skip.Daly@sen.state.nv.us, fabian.Donate@sen.state.nv.us, marilyn.DonderoLoop@sen.state.nv.us, edgar.Flores@sen.state.nv.us, pete.Goicoechea@sen.state.nv.us, scott.Hammond@sen.state.nv.us, ira.Hansen@sen.state.nv.us, dallas.Harris@sen.state.nv.us, lisa.Krasner@sen.state.nv.us, roberta.Lange@sen.state.nv.us, dina.Neal@sen.state.nv.us, rochelle.nguyen@sen.state.nv.us, james.Ohrenschaal@sen.state.nv.us, julie.Pazina@sen.state.nv.us, melanie.Scheible@sen.state.nv.us, heidi.Gansert@sen.state.nv.us, pat.Spearman@sen.state.nv.us, jeff.Stone@sen.state.nv.us, robin.Titus@sen.state.nv.us, natha.Anderson@asm.state.nv.us, shea.Backus@asm.state.nv.us, shannon.BilbrayAxelrod@asm.state.nv.us, tracy.BrownMay@asm.state.nv.us, max.Carter@asm.state.nv.us, lesley.Cohen@asm.state.nv.us, venicia.Considine@asm.state.nv.us, rich.Delong@asm.state.nv.us, jill.Dickman@asm.state.nv.us, reuben.DSilva@asm.state.nv.us, bea.Duran@asm.state.nv.us, cecelia.Gonzalez@asm.state.nv.us, michelle.Gorelow@asm.state.nv.us, ken.Gray@asm.state.nv.us, bert.Gurr@asm.state.nv.us, gregory.Hafen@asm.state.nv.us, alexis.Hansen@asm.state.nv.us, melissa.Hardy@asm.state.nv.us, brian.Hibbetts@asm.state.nv.us, sandra.Jauregui@asm.state.nv.us, heidi.Kasama@asm.state.nv.us, gregory.Koenig@asm.state.nv.us, selenia.La.Rue.Hatch@asm.state.nv.us, elaine.Marzola@asm.state.nv.us, richard.McArthur@asm.state.nv.us, brittney.Miller@asm.state.nv.us, CH.Miller@asm.state.nv.us, danielle.MonroeMoreno@asm.state.nv.us, "Mosca, Erica Assemblywoman" <erica.Mosca@asm.state.nv.us>, sabra.Newby@asm.state.nv.us, duy.Nguyen@asm.state.nv.us, PK.Oneill@asm.state.nv.us, david.Orentlicher@asm.state.nv.us, sarah.Peters@asm.state.nv.us, shondra.SummersArmstrong@asm.state.nv.us, angie.Taylor@asm.state.nv.us, clara.Thomas@asm.state.nv.us, selenia.Torres@asm.state.nv.us, howard.Watts@asm.state.nv.us, "Steve.Yeager" <steve.Yeager@asm.state.nv.us>, "Yurek, Toby Assemblyman" <toby.Yurek@asm.state.nv.us>, susan.Furlong@asm.state.nv.us, governor@govmail.state.nv.us, info@catherinecortezmasto.com, info@rosenfornevada.com, officeofthemayor@lasvegasnevada.gov, info@veteransinpolitics.org, Peggy Hall <peggy@thehealthyamerican.org>, Vanessa Murphy <vmurphy@8newsnow.com>, 13investigates@ktnv.com, darcy.spears@ktnv.com, news@news3lv.com, desk@fox5vegas.com, Austin Sachs <saintrrayfilmproductions@arkwest.com>, Senator Tom Cotton <senator@cotton.senate.gov>, Martin Pytela <martin@pytela.com>, support@life-enthusiast.com, stew@thepcradioshow.com, whistleblowers@infowars.com, vipint@infowars.com, insider@naturalnews.com, We the Patriots USA <info@wethepatriotsusa.org>, Henry Makow <hmakow@gmail.com>, editor@mercola.com, editors@thenwindy.com, info@hustlebitch.com, Buddy Rich <fibes1@gmail.com>, Gia Sachs <randg369@yahoo.com>, D <rcain101@aol.com>, richardcornforth@aol.com, Halston Zaks <saintrray@gmail.com>, travis@shetlerlawfirm.com, 张育霞 <cicyzhangyu@gmail.com>, dainfo@clarkcountyda.com

Bcc: theaustinpowers <kaustinsachs@gmail.com>

prosecutor Rinetti,

I've been going through my old email correspondence with you and need to address something of critical importance:

Your August 16, 2023, reply in response to my August 14, 2023, email is unacceptable. You stated, "This is just argument" in response to what? 21 questions. **A question is NOT argument.** What part of THAT don't YOU understand? Under what **specific authority** do you have the lawful right to ignore my questions? I've stated this a number of times in previous emails, that you are a public servant, however, you have all the appearances of a woman who believes that you are above the law. Do you realize how OBVIOUS that is to reasonable men and women? Are you so out of touch with reality that you cannot put yourself in my shoes for a moment? How would YOU like to be hounded by a prosecutor that completely disregards the facts and the law? Isn't that called tyranny? Isn't that what YOU are perpetuating here? The truth of these matters are going to continue to be widely disseminated as my wife and I are NOT going to tolerate lawless public servants who took an oath to support and defend the constitutions of Nevada and the United States.

Furthermore, those questions were posed in good faith to arrive at THE TRUTH. **You are reminded that truth does NOT fear investigation.** YOU HAVE MOST CERTAINLY OBSTRUCTED JUSTICE AND DENIED MY DUE PROCESS RIGHTS BY REFUSING TO ANSWER MY LEGITIMATE QUESTIONS AND BY REFUSING TO TASK ONE OF YOUR ON STAFF INVESTIGATORS TO INVESTIGATE THE TRUTHFUL CLAIMS MADE IN THE JOINT DECLARATION MAKING IT PERFECTLY CLEAR THAT THE CHILDREN'S HOSPITAL DOCTORS INJURED MY SON BY THEIR USE OF A MRI CONTRAST DYE CONTAINING ELEMENT NUMBER 64, GADOLINIUM.

YOU have an ongoing **DUTY** to clear the innocent. Is there a valid reason why you continue to willfully and wantonly **REFUSE** to task your on staff investigators regarding this OBVIOUS frame-up of a case?

Is there a reason why, when the entirety of the Nevada lawmakers are courtesy copied on email correspondence to

you, that you **STILL** willfully and wantonly ignore it? At this point, it's also fair to ask you, what is your problem? Are you a woman that can look at yourself in the mirror and somehow believe you have the right to destroy the lives of innocent parents who clearly were acting in the best interests of their son?

I require thoughtful answers to all the questions posed herein within 3 business days from today, August 4, 2024.

Thank you.

Attorney-in-fact Sachs

[Quoted text hidden]

theaustinpowers <kaustinsachs@gmail.com>

Thu, Aug 8, 2024 at 10:31 AM

To: Dena Rinetti <dena.rinetti@clarkcountydacountyda.com>

Cc: carrie.Buck@sen.state.nv.us, nicole.Cannizzaro@sen.state.nv.us, skip.Daly@sen.state.nv.us, fabian.Donate@sen.state.nv.us, marilyn.DonderoLoop@sen.state.nv.us, edgar.Flores@sen.state.nv.us, pete.Goicoechea@sen.state.nv.us, scott.Hammond@sen.state.nv.us, ira.Hansen@sen.state.nv.us, dallas.Harris@sen.state.nv.us, lisa.Krasner@sen.state.nv.us, roberta.Lange@sen.state.nv.us, dina.Neal@sen.state.nv.us, rochelle.nguyen@sen.state.nv.us, james.Ohrenschaall@sen.state.nv.us, julie.Pazina@sen.state.nv.us, melanie.Scheible@sen.state.nv.us, heidi.Gansert@sen.state.nv.us, pat.Spearman@sen.state.nv.us, jeff.Stone@sen.state.nv.us, robin.Titus@sen.state.nv.us, natha.Anderson@asm.state.nv.us, shea.Backus@asm.state.nv.us, shannon.BilbrayAxelrod@asm.state.nv.us, tracy.BrownMay@asm.state.nv.us, max.Carter@asm.state.nv.us, lesley.Cohen@asm.state.nv.us, venicia.Considine@asm.state.nv.us, rich.Delong@asm.state.nv.us, jill.Dickman@asm.state.nv.us, reuben.DSilva@asm.state.nv.us, bea.Duran@asm.state.nv.us, cecelia.Gonzalez@asm.state.nv.us, michelle.Gorelow@asm.state.nv.us, ken.Gray@asm.state.nv.us, bert.Gurr@asm.state.nv.us, gregory.Hafen@asm.state.nv.us, alexis.Hansen@asm.state.nv.us, melissa.Hardy@asm.state.nv.us, brian.Hibbetts@asm.state.nv.us, sandra.Jauregui@asm.state.nv.us, heidi.Kasama@asm.state.nv.us, gregory.Koenig@asm.state.nv.us, selenia.La.Rue.Hatch@asm.state.nv.us, elaine.Marzola@asm.state.nv.us, richard.McArthur@asm.state.nv.us, brittney.Miller@asm.state.nv.us, CH.Miller@asm.state.nv.us, danielle.MonroeMoreno@asm.state.nv.us, "Mosca, Erica Assemblywoman" <erica.Mosca@asm.state.nv.us>, sabra.Newby@asm.state.nv.us, duy.Nguyen@asm.state.nv.us, PK.Oneill@asm.state.nv.us, david.Orentlicher@asm.state.nv.us, sarah.Peters@asm.state.nv.us, shondra.SummersArmstrong@asm.state.nv.us, angie.Taylor@asm.state.nv.us, clara.Thomas@asm.state.nv.us, selenia.Torres@asm.state.nv.us, howard.Watts@asm.state.nv.us, "Steve.Yeager" <steve.Yeager@asm.state.nv.us>, "Yurek, Toby Assemblyman" <toby.Yurek@asm.state.nv.us>, susan.Furlong@asm.state.nv.us, governor@govmail.state.nv.us, info@catherinecortezmasto.com, info@rosenfornevada.com, officeofthemayor@lasvegasnevada.gov, info@veteransinpolitics.org, Peggy Hall <peggy@thehealthyamerican.org>, Vanessa Murphy <vmurphy@8newsnow.com>, 13investigates@ktnv.com, darcy.spears@ktnv.com, news@news3lv.com, desk@fox5vegas.com, Austin Sachs <saintrrayfilmproductions@arkwest.com>, Senator Tom Cotton <senator@cotton.senate.gov>, Martin Pytela <martin@pytela.com>, support@life-enthusiast.com, stew@thepcradioshow.com, whistleblowers@infowars.com, vipint@infowars.com, insider@naturalnews.com, We the Patriots USA <info@wethepatriotsusa.org>, Henry Makow <hmakow@gmail.com>, editor@mercola.com, editors@thenwindy.com, info@hustlebitch.com, Buddy Rich <fibes1@gmail.com>, Gia Sachs <randg369@yahoo.com>, D <rcain101@aol.com>, Halston Zaks <saintrray@gmail.com>, 张育霞 <cicyzhangyu@gmail.com>, dainfo@clarkcountydacountyda.com

Bcc: theaustinpowers <kaustinsachs@gmail.com>

prosecutor Rinetti,

This is to put you on NOTICE of your willful and wanton refusal to respond to my August 4, 2024, email within 3 business days. **This matter shall be escalated through your chain of command**, fyi.

Attorney-in-fact Sachs

[Quoted text hidden]



theaustinpowers <kaustinsachs@gmail.com>

TIME SENSITIVE: Re YOUR DUTY

theaustinpowers <kaustinsachs@gmail.com>

Thu, Jan 18, 2024 at 1:14 PM

To: Dena Rinetti <dena.rinetti@clarkcountyda.com>

Cc: 张育霞 <cicyzhangyu@gmail.com>

Bcc: theaustinpowers <kaustinsachs@gmail.com>

Ms. Rinetti,

Please take NOTICE: My wife, Yuxia Zhang, is courtesy copied on this email and is my WITNESS.

So, it took a hearing for you to PUBLICLY ADMIT the reason you ignored and continue to ignore some of my emails is because in your own words they were "inappropriate".

Let's get something straight, Ms. Rinetti, you are a public servant. It appears you somehow believe that you're above the law because you do NOT have the luxury of ignoring any of my email correspondence. You are paid to serve the public. You, along with Ms. Jobe continue with your fraudulent prosecution with zero competent fact witnesses to any child neglect/abuse whatsoever.

If you thought/felt/believed any of my email correspondence was "inappropriate", you had a DUTY (duty=law) to tell me 3 things:

- 1) Exactly what was inappropriate?
- 2) Why was it inappropriate?
- 3) The specific authority under which it is inappropriate?

I agree that my email correspondence (the emails you choose to ignore) is "inappropriate" upon PROOF OF CLAIM that I have not made honest/earnest attempts to get answers to legitimate questions that concern my life, liberty, and freedom. I require your "PROOF OF CLAIM" in the form of a signed and notarized affidavit under the penalty of perjury with your wet ink signature mailed to me no later than 10 business days from today, January 18, 2024 to:

Kimball Austin of the family Sachs
PO BOX 2
PARON, AR

Your silence shall be deemed your confession that your claim that any of my email correspondence was "inappropriate" is without merit and that you have in fact made up this excuse to avoid your duty to respond in a timely and professional manner which also equates to your being in DISHONOR yet again.

Per the Nevada District Attorneys Association:

"Prosecutors are legally and ethically obligated in every case to pursue justice by discerning the truth and protecting the rights of all, i.e. victims, defendants, and the community."

SOURCE: <https://nvdaa.org/criminal-justice-101/> under MYTH #3: Defense attorneys are just as interested as prosecutors in seeking the truth and protecting their communities.

Are you telling me or implying to me that YOU are NOT "legally and ethically obligated in every case to pursue justice" and to protect "the rights of all"? Is that your position Ms. Rinetti?

It would appear so BECAUSE I've already put you on NOTICE in a previous court filing that you had (and to this day, you still do) a DUTY to task one of your on-staff investigators to investigate my CLAIM that the gadolinium in the Bayer Pharma contrast dye Gadavist had a severely negative impact on my son (my claimed property which NO ONE in the court has rebutted) that, in turn, caused his temporary cachexia/encephalopathy/weight loss, all of which I was wrongly blamed for by detective Slack.

EXHIBIT C

So, you're SUPPOSED to protect the public from me, eh? Let's take a brief look at the facts Ms. Rinetti. Oh, forgive me, the facts are on the moon! So, like Ms. Jobe, you don't care about the facts and you don't care about the law. THAT IS PAINFULLY OBVIOUS AFTER DEALING WITH YOU AND MS. JOBE FOR OVER 4 YEARS NOW. Well, the jurors are most certainly going to care about the facts. The fact is the UMC Children's Hospital doctors damaged my son. You did nothing to investigate my claims made under the penalty of perjury in SPITE of being put on NOTICE for your failure to do your duty. Well, that's a serious breach right there. Shall I continue? Oh, probably not, because your actions/words/deeds PROVE you couldn't care less about the truth which brings us to the real heart of the matter.

This ENTIRE fraudulent case is about one thing, and one thing only, the money. How much money do you personally stand to collect in this matter Ms. Rinetti? Oh, please don't insult my intelligence that it's not about the money. I'm wise to you and all your fellow officers of the court. So, I'm going to ask the question again:

What is the real/actual United States dollar fine for each of the 3 felony charges?

I require your written answer in 3 business days from today, January 18, 2024. There is NO POINT to me wasting my time to have the judge answer this question when you are perfectly capable of answering it because this is YOUR CASE.

My position is, IF you were doing your job (your duty) you would have already have dropped your false charges, but obviously the love of money is more important than your duty to be a good and honest woman in the eyes of your Creator/God. You're racking up a LOT of bad karma Ms. Rinetti. See, the thing is this, my actions saved my son's life. In the time we had him at home, we were able to successfully detox enough of the poisons out of his body that he was able to make a recovery after they kidnapped him back to that third rate butcher operation called a children's hospital. The jurors are going to hear EVERY LAST DETAIL of my PERSONAL FIRST HAND EXPERIENCE. Whether you know it or not, good does triumph over evil Ms. Rinetti. GOD KNOWS I did everything in my power to help heal my son safely and effectively. GOD is on the side of my wife and I. You have some pretty insurmountable competition there Ms. Rinetti. Please do the right thing and drop your fraudulent charges stat.

Thank you.

Mr. Sachs