

DONALD FRIEDMAN 200503494  
NAPA COUNTY JAIL  
1125 THIRD STREET  
NAPA, CA 94559-3015  
PLAINTIFF PRO SE

**FILED**

DEC 14 2006

NANCY MAYER WHITTINGTON, CLERK  
U.S. DISTRICT COURT

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

DONALD FRIEDMAN  
200503494  
NAPA COUNTY JAIL  
1125 THIRD STREET  
NAPA, CA 94559-3015  
PLAINTIFF,

CASE No.:  
  
COMPLAINT FOR  
DECLARATORY AND  
INJUNCTIVE RELIEF  
UNDER 5 U.S.C. § 552  
(FOIA) AND 5 U.S.C. § 552a  
(PRIVACY ACT)

v.

U.S. SECRET SERVICE  
1800 G STREET, NW  
WASHINGTON, DC 20223  
DEFENDANT.

CASE NUMBER 1:06CV02125  
JUDGE: Richard W. Roberts  
DECK TYPE: FOIA/Privacy Act  
DATE STAMP: 12/14/2006

COMPLAINT  
INTRODUCTION

1. THIS IS AN ACTION UNDER THE FREEDOM OF  
INFORMATION ACT ("FOIA"), 5 U.S.C. § 552,

RECEIVED

OCT 16 2006

NANCY MAYER WHITTINGTON, CLERK  
U.S. DISTRICT COURT

1.

1

AS AMENDED, AND THE PRIVACY ACT OF 1974  
("PA"), 5 U.S.C. § 552a, AS AMENDED, TO COMPEL  
THE UNITED STATES SECRET SERVICE ("DEFENDANT")  
TO PRODUCE COPIES OF ANY AND ALL FILES,  
RECORDS, DOCUMENTS, INFORMATION, PHOTOS,  
RESEARCH MATERIALS (INCL. RESULTS), AND  
PURCHASING AND ANY OTHER CONTRACT-RELATED  
INFORMATION RELATED TO OR REFERRING TO ANY  
U.S. SECRET SERVICE DEVELOPMENT OF,  
ACQUISITION OF, INSTALLATION OF, DEPLOYMENT  
OF, USE OF, TESTING OF, RESEARCH RELATED TO,  
AND/OR INVESTIGATION OR EVALUATION OF THE  
CAPABILITIES, PROPERTIES, AND/OR EFFECTS OF

ANY:

1) DIRECTED ENERGY WEAPONS OR SYSTEMS

(INCLUDING ANY AND ALL PARTS OR

COMPONANTS THEREOF); AND/OR

2) DIRECTED ENERGY DEVICES OR SYSTEMS

(INCLUDING ANY AND ALL PARTS OR

COMPONANTS THEREOF); AND/OR

3) ELECTROMAGNETIC RADIATION -

EMITTING DEVICES OR SYSTEMS

(INCLUDING ANY AND ALL PARTS OR

COMPONANTS THEREOF) WHICH ARE

CAPABLE OF CAUSING ANY INJURY OR

PERCEPTION OF PHYSICAL PAIN IN ANY  
PERSON WHO IS HIT OR STRUCK BY THE  
DEVICE'S OR SYSTEM'S EMISSIONS.

PARTIES

2. PLAINTIFF, DONALD FRIEDMAN, IS OVER 18 YEARS  
OLD, A CITIZEN OF THE STATE OF CALIFORNIA,  
AND IS INCARCERATED AS AN UNSENTENCED,  
PRE-TRIAL, PRO SE INMATE AT THE NAPA  
COUNTY JAIL, NAPA, CALIFORNIA. THE PLAINTIFF  
IS THE REQUESTER OF THE RECORDS.

3. DEFENDANT, U.S. SECRET SERVICE, AN AGENCY  
WITHIN THE UNITED STATES DEPARTMENT OF

HOMELAND SECURITY (AN EXECUTIVE DEPARTMENT OF THE UNITED STATES), HAS POSSESSION AND/OR CONTROL OVER ALL OF THE RECORDS, ETC. THE PLAINTIFF SEEKS. THE DEFENDANT IS AN AGENCY WITHIN THE MEANING OF 5 U.S.C. § 552 (f).

JURISDICTION AND VENUE

4. THIS COURT HAS JURISDICTION OVER THIS ACTION PURSUANT TO 5 U.S.C. § 552 (2)(4)(B) AND 5 U.S.C. § 552a. VENUE IS PROPER IN THIS COURT PURSUANT TO 5 U.S.C. § 552 AND 5 U.S.C. § 552a.

COUNT ONE

5. From SHORTLY AFTER PRESIDENT JOHN F. KENNEDY'S ASSASSINATION IN 1963, WHEN THE U.S. SECRET SERVICE'S DIRECTOR CREATED THE PROTECTIVE RESEARCH DIVISION, THE DEFENDANT HAS MADE A CONSTANT AND DILIGENT EFFORT TO RESEARCH, DEVELOP, TEST, USE, EVALUATE, AND ATTEMPT TO CREATE COUNTER-MEASURES FOR EVERY TYPE OF WEAPON, DEVICE, TECHNOLOGY, AND TECHNIQUE WHICH COULD POSE A SUBSTANTIAL THREAT TO THE HEALTH, SAFETY, OR SELF-CONTROL OF ANY PERSON DEFINED AS A "PROTECTEE" UNDER

18 U.S.C. § 3056. AS A RESULT OF THESE  
ACTIVITIES, WHICH WERE PERIODICALLY STEPPED-  
UP AS A RESULT OF TRAGIC EVENTS SUCH AS  
THE ASSASSINATION OF ROBERT KENNEDY IN  
1968 AND THE ATTEMPTED (AND NEARLY  
SUCCESSFUL) ASSASSINATION OF PRESIDENT  
RONALD REGAN IN 1981, THE DEFENDANT'S  
PROTECTIVE RESEARCH DIVISION BEGAN TO  
SECRETLY RESEARCH, DEVELOP, TEST, EVALUATE, USE,  
AND ATTEMPT TO CREATE COUNTERMEASURES  
AND DETECTION METHODS FOR DIRECTED ENERGY  
WEAPONS ("DEWS")/SYSTEMS, OTHER DIRECTED  
ENERGY DEVICES (INCLUDING, BUT NOT LIMITED

TO ELECTROMAGNETIC RADIATION-BASED, WALL-  
PENETRATING AUDIO & VISUAL/VIDEO (ELECTRONIC)  
SURVEILLANCE TECHNOLOGIES, LASER AND/OR  
MICROWAVE MICROPHONE TECHNOLOGIES, WALL/  
CLOTHING PENETRATING WEAPON DETECTION  
TECHNOLOGIES, OCULAR/RETINAL IMAGE/VIDEO  
PROJECTION TECHNOLOGIES, REMOTE EYE/PUPIL  
TRACKING TECHNOLOGIES, FOCUSED SOUND  
PROJECTION TECHNOLOGIES, HOLOGRAPHIC  
PROJECTION TECHNOLOGIES, MICROWAVE  
AUDITORY EFFECT-BASED COMMUNICATION  
TECHNOLOGIES, ETC.), AND OTHER ELECTROMAGNETIC  
RADIATION-BASED TECHNOLOGIES WHICH COULD BE



USED TO INTJURE SOMEONE OR TO INFLUENCE  
OR CONTROL SOMEONE'S BEHAVIOR. DURING  
SOME OF THIS RESEARCH, ETC., THE DEFENDANT  
ENGAGED IN MANY YEARS OF OVER-ZEALOUS,  
WIDESPREAD, AND TOTALLY UNLAWFUL HUMAN  
EXPERIMENTATION AS WELL AS UNLAWFUL  
USE OF THESE TECHNOLOGIES ON UNWITTING,  
UNDESERVING, AND UNCOOPERATIVE SUBJECTS,  
INCLUDING THE PLAINTIFF AND OTHER MEMBERS  
OF PLAINTIFF'S FAMILY.

6. ON JULY 21, 2003 DEPUTY ASSISTANT DIRECTOR  
DONALD P. ZIMMERMAN (OF THE U.S. SECRET

SERVICE) PROVIDED, ON BEHALF OF THE ENTIRE  
U.S. SECRET SERVICE AND AS PART OF A SEPERATE  
CRIMINAL CASE IN THE U.S. DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA, A  
SWORN DECLARATION WHICH DENIED THAT THE  
SECRET SERVICE UTILIZES ANY TECHNIQUE  
OR EQUIPMENT WHICH, THROUGH THE USE OF  
ELECTROMAGNETIC RADIATION, CAN CONTROL  
ANY INDIVIDUAL. THIS DECLARATION IS  
PERJURED AND STATES COMPLETELY FALSE  
INFORMATION FOR THE PURPOSE OF DELIBERATE  
DECEPTION.

7. THE PURPOSE OF USING ANY DIRECTED ENERGY WEAPON ON A PERSON OR PERSONS IS TO DELIBERATELY CAUSE THEM TO PERCEIVE SOME FORM OF PAIN OR DISCOMFORT OR TO CAUSE THEIR BODY OR BODIES TO INVOLUNTARILY REACT IN SOME TYPE OF ~~PHYSIOLOGICAL~~ <sup>PHYSIOLOGICAL</sup> WAY. ALL OF THESE EFFECTS EXERT CONTROL/INFLUENCE OVER THE PERSON(S) HIT BY THE EMISSIONS FROM THE DIRECTED ENERGY WEAPON.

8. IN MAY 2006 PLAINTIFF CONTACTED MR. LARRY STEWART, A FORMER EMPLOYEE OF THE U.S. SECRET SERVICE. AS A RESULT OF THIS CONTACT

AS WELL AS SUBSEQUENT CONTACTS WITH MR. STEWART THE PLAINTIFF WAS ABLE TO CONFIRM THAT THE DEFENDANT HAS RESEARCHED, TESTED, AND DEPLOYED DEWS AND OTHER RELATED TECHNOLOGIES. THE PLAINTIFF HAS ADMISSIBLE EVIDENCE OF THE PERJURY AND THE DEFENDANT'S TESTING, DEPLOYMENT, ETC. OF THE DEWS IF IT IS REQUIRED.

9. BY LETTER, DATED SEPTEMBER 1, 2006 TO THE FOIA/PA MANAGER AT THE U.S. SECRET SERVICE FOIA/PA OFFICE, THE PLAINTIFF REQUESTED COPIES OF ANY AND ALL FILES, RECORDS, DOCUMENTS,

INFORMATION, PHOTOS, RESEARCH MATERIALS  
(INCLUDING RESULTS), AND PURCHASING AND ANY  
OTHER CONTRACT-RELATED INFORMATION  
RELATED TO OR REFERRING TO ANY U.S. SECRET  
SERVICE DEVELOPMENT OF, ACQUISITION OF,  
INSTALLATION OF, DEPLOYMENT (USE) OF, TESTING  
OF, RESEARCH RELATED TO, AND/OR INVESTIGATION  
OR EVALUATION OF THE CAPABILITIES, PROPERTIES,  
AND/OR EFFECTS OF ANY:

1) DIRECTED ENERGY WEAPONS OR SYSTEMS

(INCLUDING ANY AND ALL PARTS OR

COMPONENTS THEREOF); AND/OR

2) DIRECTED ENERGY DEVICES OR SYSTEMS

(INCLUDING ANY AND ALL PARTS OR  
COMPONENTS THEREOF); AND/OR

3) ELECTROMAGNETIC RADIATION-EMITTING

DEVICES OR SYSTEMS (INCLUDING ANY  
AND ALL PARTS OR COMPONENTS THEREOF) <sup>18</sup>

WHICH ARE CAPABLE OF CAUSING ANY

INJURY OR PERCEPTION OF PHYSICAL

PAIN IN ANY PERSON WHO IS HIT OR

STRUCK BY THE DEVICE'S OR SYSTEM'S

EMISSIONS.

SEE ATTACHED, EXHIBIT "A," A TRUE AND CORRECT

COPY OF A HAND-COPIED LETTER WHICH THE  
PLAINTIFF SENT TO THE DEFENDANT.

10. BY LETTERS, DATED SEPTEMBER 9<sup>TH</sup> AND 29<sup>TH</sup>,  
2006 THE PLAINTIFF CLARIFIED (BUT DID NOT  
MODIFY) HIS PREVIOUS FOIA/PA REQUEST  
DATED SEPTEMBER 1, 2006. SEE ATTACHED,  
EXHIBITS "B" AND "C," TRUE AND CORRECT  
COPIES OF HAND-COPIED LETTERS WHICH THE  
PLAINTIFF SENT TO THE DEFENDANT.

11. THE DEFENDANT, THROUGH ITS FOIA/PA  
OFFICE, HAS REFUSED OR FAILED TO RESPOND  
TO THE PLAINTIFF'S STATUTORILY PERFECTED

REQUEST FOR RECORDS WITHIN THE 20 DAY  
MANDATED TIME LIMIT AND THAT REFUSAL  
OR FAILURE TO RESPOND ACTS AS A  
STATUTORILY DEFINED EXHAUSTION OF THE  
PLAINTIFF'S APPLICABLE ADMINISTRATIVE  
REMEDIES. SEE 5 U.S.C. § 552 (a)(6)(A)(i)  
AND 5 U.S.C. § 552<sup>g</sup>.

12. PLAINTIFF HAS A STATUTORY RIGHT TO THE  
RECORDS HE SEEKS, PLAINTIFF MADE A  
STATUTORILY PERFECTED FOIA REQUEST, AND  
THE DEFENDANT IS ILLEGALLY REFUSING TO  
DISCLOSE THOSE RECORDS TO THE PLAINTIFF.



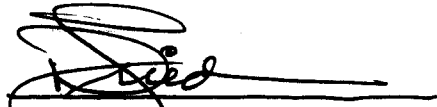
WHEREFORE, PLAINTIFF REQUESTS THAT THIS

COURT:

- (1) DECLARE THAT DEFENDANT'S REFUSAL TO DISCLOSE THE RECORDS, ETC. REQUESTED BY PLAINTIFF IS UNLAWFUL;
- (2) ORDER DEFENDANT TO MAKE THE REQUESTED RECORDS AVAILABLE TO PLAINTIFF;
- (3) AWARD THE PLAINTIFF HIS REASONABLE ATTORNEY'S FEES AND COSTS IN THIS ACTION AS PROVIDED BY 5 U.S.C. § 552 (a)(4)(E) AND 5 U.S.C. § 552a; AND

(4) GRANT SUCH OTHER AND FURTHER RELIEF AS THIS  
COURT MAY DEEM JUST AND PROPER.

RESPECTFULLY SUBMITTED,

A handwritten signature in black ink, appearing to read "Donald Friedman", written over a horizontal line.

DONALD FRIEDMAN

PLAINTIFF PRO SE

DATED: OCT. 4, 2006