

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF FLORIDA  
FORT MYERS DIVISION**

LEONARD G. HOROWITZ,	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 2:20-cv-00955-JLB-NPM
	)	
PFIZER INC., et al.,	)	
Defendants.	)	

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**AFFIDAVIT OF LEONARD G. HOROWITZ IN SUPPORT OF PLAINTIFF’S  
OPPOSITION TO DEFENDANT HEARST’S MOTION TO DISMISS**

- 1) I, LEONARD G. HOROWITZ (hereafter, “I,” “my,” “Plaintiff,” or “Horowitz,”) file this Affidavit under the pains and penalties of perjury at law, and hereby state the following facts are true to the best of my knowledge and belief; and if called to testify before this Court on these matters, I shall do so competently.
- 2) I am an individual over the age of twenty-one (21) years, a resident of Lee County in the State of Florida.
- 3) I affirm that the Exhibits 1 thru 44 attached to my Opposition filing are true and correct copies of the original documents in my possession. They evidence my extensive research beginning in January 2020, without which the Defendants’ joint actions and motives for conspiring to disparage me and my commercial interest could not be known.
- 4) I affirm that on January 17, 2020 I registered with the United States District Court of the District of Hawaii, as a “CJA Expert” medical/legal investigator, with particular expertise in “Public Corruption Cases.”

- 5) The gravamen of my federal Claim for Injunctive Relief in this action is that Defendant Hearst, with Pfizer, Moderna, Henry Schein, Inc., and their partners, subsidiaries, contractors, writers, advertisers, broadcasters, and allied federal agents and agencies (“Does 1-50”) embody a public/private monopolistic enterprise (hereafter, the “Enterprise”) that has repeatedly and maliciously disparaged and deprived me as a religious person, a Levitical priest, and a businessman, serving to the best of my knowledge and ability public health, and society’s interests in drug safety.
- 6) I affirm that the Defendants, through their Enterprise, have unlawfully, voluntarily, intentionally, and knowingly conspired, combined, confederated, and agreed together and with each other and with other individuals, including federal actors, both known and unknown to me, to maliciously disparage and purposefully damage me to compete unfairly in the healthcare industry.
- 7) The Enterprise has targeted me for disparagement and financial damage as a health professional, expert in the field of vaccinology and communicable diseases, and businessman integrating my religious beliefs and practices into my duty to serve society’s health and safety.
- 8) The Enterprise deprived me of my civil rights and religious freedom by intentionally misrepresenting and smearing my fair and honorable service to society in “alternative (natural) medicine” that features my religious/spiritually-based 528 therapeutic frequency discoveries and related commercial interests in products and services in the “528-industry”.
- 9) To damage my free and fair trade in 528-commerce, the Enterprise targeted my pioneering product called “OxySilver™ with 528.” This 528-resonating anti-microbial, as well as other 528 products and services I brought to

market, compete directly against the Defendants' drugs, vaccines, research, science, advertisements, and public health-impacting policies.

- 10) The Enterprise has viewed and treated me as an unwanted competitor and nuisance to be 'neutralized.' They have repeatedly evidenced this attitude and malicious practice by exploiting their media to publish ad hominem attacks damaging my professional reputation; and by OxySilver disparagements restrained my free and fair OxySilver trade.
- 11) At the same time The Enterprise has infringed on my intellectual properties, taken several of my pioneering discoveries and applications in water science, electro-genetics, and nano-bioelectronics, and commercialized devices, such as vaccine hydrogels containing silver, copper or gold-infused electrodes that provide the most advanced methods for drug delivery, "genetic therapy," and wireless 'data-mining' enabling artificial intelligence to advance to new heights in neuroscience and medicine.
- 12) My Complaint factually details my religious background and religious/spiritual products and services. As a Levitical priest and health science scholar, and a federally-registered medical expert witness who has published prolifically in the field of HIV/AIDS, emerging viruses, and communicable diseases, I view infectious diseases, prevention, and treatment from a 'Christian Science' perspective.
- 13) I advanced OxySilver™ from this broad view. It is the first nutraceutical designed to be used with prayer. This claim is based on my Bible study intertwined with scientific research revealing the unique and powerful role 528Hz frequency plays in the musical-mathematics of creation, 'intelligent' design, water-structuring, electro-genetics, homeopathic 'memory,' metaphysics or spiritual dynamics.

- 14) I apply my knowledge of bio-energetics, electro-genetics, biophysics, bioacoustics, musical mathematics, all related to natural spiritual dynamics, to develop and market safe and effective therapeutics that directly compete against the Defendants' vaccines and drugs. For me, my career is a religious exercise in public service advancing healthcare and health science.
- 15) The Defendants' activities are not aligned with mine, and they publish skeptically and disparagingly about me. But reasonable skepticism is extinguished by considering the following facts, aside from the growing consensus of medical scientists who subscribe to my theories and concerns regarding the laboratory origin of COVID-19 and the Enterprise's actions in concealing this consensus and the basis of their conclusions: (1) medical scientists accept resonance energy in biophysics like clinicians accept 'nuclear-magnetic resonance imaging' to diagnose pathologies; (2) what monotheistic religions call the "Holy Spirit," and eastern spiritualists call "chi energy" and "prana," operates similarly within the laws of physics and biophysics enabling studies, discoveries, and therapeutic product developments in these interrelated fields. Defendants Pfizer and Moderna, and their government financiers at DARPA and BARDA, likewise commercialize and capitalize this intelligence.
- 16) Due to my discoveries and scientific publications I claim that "528Hz frequency" of sound (i.e., a vibrating "wave" and "pure tone" in music) operates at the heart of nature and universal construction. Other independent investigators have repeatedly proven this 528Hz frequency acts as a powerful anti-oxidant, and as such is immune-boosting and remedial against infectious diseases.

- 17) Moreover, 528Hz is presumed to give rise to 528nm of light that is the greenish-yellow color of oxygenating chlorophyll, another immune-boosting anti-oxidant.
- 18) I claim that 528Hz frequency is the "MI" note, or "Miracle" frequency in the original Judeo-Christian musical scale called the "Solfeggio" in Catholicism. Alternatively, in Judaism, I claim that 528Hz is the "key of the house of David" (Isaiah 22:22; Rev. 3:6-8) believed to have been used by King David to tune his healing harp.
- 19) It is said that "Love is the Universal Healer," "Music is the Universal Language," and "Water is the Universal Solvent." I put these three doctrines together in developing "OxySilver™ with 528."
- 20) Vibrating at the heart of every rainbow and human heart is 528 frequency. I claim this therapeutic energy broadcasts healing when that is intended during faithful loving prayer. I also claim that this precise frequency best reflects and facilitates the "Holy Spirit Power of Love" that is quintessential to natural healing. Rejuvenation during sleep and bathing is naturally accomplished this way.
- 21) My claims are also backed by science and the world around us. The botanical world's greenery and ocean waves generate oxygen and cleansing negative air ions. These carry anti-oxidant healing power as does the 528 "wave" mediating through water and hydrated air. Waves of energizing electrons (and scalar forces in parallel dimensions) vibrate and spin in sync with 528 energy. This is called "coherence" or "phase-locking" in physics, electro-mechanics, and bioacoustics.
- 22) In other words, the "528 frequency wave" that Defendant Hearst has repeatedly smeared is encoded in the Bible's Book of Numbers, and studied and affirmed by science. These facts present an extraordinary opportunity

to advance medicine, bless civilization, and restore the environment through practical applications of this knowledge. But instead of celebrating and heralding my discoveries, the Enterprise has acted repeatedly to censor and disparage this intelligence.

- 23) The main reason for the Defendants' malice is that my ground-breaking revelations in 528 frequency science and religious theology not only competes against the pharmaceutical/chemical (i.e., allopathic) medical paradigm, but *shatters* conventional concepts upon which the Defendants' main income rests.
- 24) And most convincing for skeptics, my medical science claims are corroborated by Pfizer officials' statements and investments that I detail below.
- 25) Instead of collaborating to advance this good news with me and my religious, spiritual, and natural healthcare communities, the Defendants' Enterprise, that includes federal agents and agencies, and most actively the Defense Advanced Research Projects Agency or "DARPA", for National Security reasons, or for greedy commerce, tortiously interferes with my commercial interests as competitors; and consistently acts to conceal, obfuscate, convert, and monopolize the intelligence I advance, my intellectual property, and 528 frequency-based industry. These wrongful actions continue, with damage compounding daily, not only to me but to my family and loved ones, and society at-large.
- 26) After I did perceive the Enterprise's bad faith in late summer of 2016 when I was contacted by Hearst's "fact-checker" in advance of the September issue of *Popular Mechanics* containing the "Article I" smear publication that I protested at that time, Hearst's covert operations, denials of its business partners in Big Pharma (that is "fraudulent concealment"), prevented me,

as a reasonable person and avid researcher, from discovering by ‘due diligence’ my causes of action. A reasonable lay person could not have discovered the facts establishing my claims until witnessing in January 2020 Henry Schein’s participation in the 2019 “Event 201” coronavirus preparedness conference. That’s when I realized my previous employer, Schein, was complicit in the Enterprise’s pattern-and-practice of hiding scientific and commercial intelligence among the Defendants advancing COVID-19 commerce. I had witnessed Schein do the same years earlier with HIV/ AIDS.

- 27) Before that time, January 2020, I did not know the facts establishing my claim of religious persecution and deprivation of religious freedoms and rights. Moreover, tortious interference with OxySilver’s business advantage through unfair and deceptive trade was not on my radar screen because Hearst’s *Popular Mechanics* Article I, and Hearst’s partnership in Conde Naste’s *WIRED* publications generally targeted “vaccination hesitancy” not *religious hesitancy to get vaccinated*. Nor did either 2016 publication reveal the Defendants’ interests in bioenergetics, frequency therapeutics, and developing products competing directly against OxySilver with 528 frequency.
- 28) The Enterprise effectively concealed and denied the harm that they were purposely inflicting on me, and my religious products, and my competing product – OxySilver™ with 528.
- 29) Even with extreme ‘due diligence’ I could not have discovered the torts claimed because the needed intelligence was largely ‘classified’ by this National Security Enterprise – a public/private coalition within which the Defendants acted and continue to operate largely in secrecy.

- 30) And in 2016, even extreme 'due diligence' could not have revealed the discriminatory animus abused to justify the targeting of religious leaders, myself included, because this agenda was classified at that time, and not made public before the World Health Organization ("WHO") put "Vaccine Hesitancy" in its top "Ten Threats to Global Health in 2019." Even then, I was precluded from diligent discovery by the Enterprise's secret operations, including government/industry think tank determinations and recommendations that religious leaders be targeted for 'attitude change.'
- 31) My 2020-21 'due diligence' revealed that the WHO and Strategic Advisory Group of Experts (on Immunisation)("SAGE") published a policy proposal in 2014 urging the Enterprise to 'target' religious leaders, such as myself, to change anti-vaccination attitudes and messages influencing communities.<sup>1</sup> Pfizer's Noel T. Brewer, who served on paid advisory boards for Merck, and received funding from Pfizer as well as Pfizer's parent company, GSK, wrote in the policy-initiating treatise, "Meeting the Challenge of Vaccination Hesitancy," funded in large part by the Bill & Melinda Gates Foundation, that "social processes are especially pertinent in an era defined by social media, anti-vaccine activists, and misinformation. . . . The consequence is that anti-vaccine activists had, for a while, locked down many social media platforms." The "engagement of religious and

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<sup>1</sup> Quoting the WHO's 2014 publication, *Strategies for Addressing Vaccine Hesitancy—A Systematic Review*, "Interventions relating to 'Contextual influences' primarily included the engagement of religious and influential members of the community through, for example, communication campaigns . . . engage religious or other influential leaders to promote vaccination in the community. The most effective interventions employed a number of these strategies (multi-component interventions) . . . interventions that adopted interventions that were only applicable to the individual from a distance (e.g., posters, websites, media releases, radio announcements) brought little benefit." (*Id.* p. 57)



influential members of the community through, for example, communication campaigns,” was subsequently commenced, heavily in 2016.

32) Hearst’s 2016 “Article I,” the intertwined *WIRED* publication by Hearst’s partner, Conde Nast by author Colin McRoberts on Dec. 10, 2016, and subsequent 2018 *Forbes* expanded-function smear campaign against me, evidence this organized (alleged criminal) conspiracy to ‘neutralize’ me.

33) Conde Nast, Hearst’s partner in PubWorX and ProCirc as of 2016, holds massive interests in the pharmaceutical trade through Conde Nast Health.<sup>2</sup>

34) Federal actors aided-and-abetted the conspiracy and tortious interference with my economic advantage, especially DARPA.<sup>3</sup>

35) Leaders in science and religion contributing to “vaccination hesitancy,” such as myself, were smeared while the authors and publishers fraudulently concealed their conflicting interests.

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<sup>2</sup> Hearst partnered with *WIRED*’s publisher, Conde Nast in 2016, joint-ventured in PubWorX--an “independent company” that managed “production, procurement and circulation” for these two of the world’s largest magazine publishers, to “offer custom programs across the industry.” ProCirc was formed the following year, in 2017, as a “Florida-based publishing services company with more than 50 publishing clients across more than 250 titles. The deal also add[ed] more than 18 million readers to its service base.”

<sup>3</sup> Quoting from Benecke O and DeYoung SE. Anti-vaccine decision-making and measles resurgence in the United States, *Global Pediatric Health*, Vol. 6, 2019: “In 2015, DARPA’s (the US Defense Advanced Research Projects Agency) Bot Challenge asked researchers to identify “influence bots” on Twitter in a stream of vaccine-related tweets, focusing heavily on the actors behind the content.<sup>11</sup> Researchers studied #VaccinateUS, a Twitter hashtag linked directly to Russian troll accounts connected to the Internet Research Agency—a company backed by the Russian government that specializes in online influence projects.<sup>11</sup> One of the primary tactics used by these influence bots is to use the vaccine debate to target socioeconomic tensions that are unique to the United States. For example, anti-vaccine tweets from this source will often blame elite groups for forcing vaccine on low-income people. In addition, it was determined that “93% of tweets about vaccines are generated by accounts whose provenance can be verified as neither bots nor human users yet who exhibit malicious behaviors.”<sup>11</sup> This amplifies the misinformation that parents are exposed to, and it fuels the belief that the science behind vaccine efficacy and safety is still debatable.

- 36) McRobert's fraudulently concealed the fact that he acted as a secret agent for the inter-corporate/ government enterprise – a covert intelligence-gatherer and propagandist working not only in alliance with Hearst, but also with the government's leading military-counter-intelligence groups. My colleagues and I discovered high-level military connections to McRoberts, including Col. Stanley McChrystal's "The McChrystal Group." McRoberts and McChrystal's company are intertwined with Axiom Learning, LLC, and the Prism Learning Group, each largely financed, partnered, or strongly allied in vaccine-advocacy in favor of leading stockholders in the biotechnology and "geneto-pharmaceutical" fields (i.e., the Defendants' Enterprise).
- 37) According to public interest groups and mainstream news sources, Bill Gates financed these groups most prominently while actively pursuing the agenda of DARPA. My research uncovered Gates's financing with Jeffrey Epstein's investors financing Harvard and MIT neuroscience labs, advancing the drug-delivery hydrogels used in the Pfizer and Moderna mRNA vaccines, and data-mining for companies such as Hearst's FirstData Bank and its partner, the McKesson Co.
- 38) In McRobert's published words, he appeared at the "Conspira-Sea Cruise for Conspiracy Theorists" that I attended in early 2016. According to McRobert's writing in *WIRED*, McRoberts "infiltrated" this event as a "skeptic." Yet he and his publishers concealed McRobert's corporate alliances, his pro-vaccine commission, and commercial conflicting interests.
- 39) The publishing Enterprise's persuasion outcomes were precisely those of federal agents and agencies involved with DARPA in advancing hydrogel neuroscience and "biodefense" for National Security.

- 40) In the case at bar, the “Conspira-Sea Cruise for Conspiracy Theorists” provided a great opportunity to discredit “fringe thinkers” and “fringe theory evangelists.” McRoberts judged me as both. When confronted about his mission he repeatedly denied his covert operations and corporate conflicting interests.
- 41) McRoberts *falsely* published in *WIRED* “One of the journalists [onboard the cruise, Anna Merlan] was ambushed in the Internet cafe by a couple [my partner, Sherri Kane, and I] who had accused her of being an agent of the CIA”. “She [Merlan] managed to persuade them that she was not an undercover agent.” That writing misrepresents what happened. We never “accused” Merlan of this, we asked her if she was a CIA agent.
- 42) Similarly, fraudulently denying and concealing Hearst’s nefarious objective to discredit “anti-vaxxers,” and repeatedly denying Hearst’s complicity with drug companies, writer Bronwen Dickie, like McRoberts, misrepresented by omissions events that occurred on the ship.
- 43) I had no knowledge at that time that the Defendants’ corporate/military Enterprise had conspired to smear me for my religious objections to genetically and immunologically risky vaccinations, disparage my alternative OxySilver™ with 528 product, and subvert my entire 528 frequency industry, to monopolize this field of ‘bio-energetics’ and ‘frequency therapeutics’.
- 44) Any reasonable person’s ‘inquiry reasonable’ could not have discovered this inter-corporate/government conspiracy and its conspiratorial objective because these are complex, mostly concealed, associations. They take months of full time research to uncover evidence of such a conspiracy. Who has that time? Very few.

- 45) I did not discover the required elements of my claims until January 2020, months after I viewed Henry Schein's presence at Johns Hopkins at "Event 201" – a 'Coronavirus Predictive Programming' conference co-sponsored by the Bill Gates's Foundation and the World Economic Forum.
- 46) I thought the *Popular Mechanics* article was published in September 2016 exclusively to discredit anti-vaxxers. I was wrong. The 'religious persecution' angle escaped me as it would any reasonable person. The Defendants' covert administration of National Security policy objectives to discredit religious leaders to promote vaccinations was as "radical" as the Defendants' Enterprise made me out to be in their publications.
- 47) The fraudulent scheme included defaming me as a "conspiracy theorist" to decoy and conceal their actual public/private conspiracy to subvert vaccination risk-awareness in religious communities in particular.
- 48) Just as Collin McRoberts had done, Bronwen Dickie frankly denied and fraudulently concealed her commission to write an article discrediting vaccine hesitant thinkers (including anti-vaccination religious leaders). Dickie repeatedly denied to me, and fraudulently concealed from me, Hearst's commercial alliance with Pfizer, its parent company, GSK, and multiple conflicting interests in healthcare. Dickie scoffed at this notion of Hearst's complicity in a conspiracy to defraud the public for unjust enrichment. And Dickie's attitude and actions fraudulently concealing her Enterprise's paymasters is expressed in her published Article I.
- 49) "I'm not here to degrade anyone, Len" Dickie falsely stated then published the opposite in Article I.

In Dickie's anti-Semitic view, Len bore a "strong resemblance to the Count from Sesame Street if . . . . [i]f you had frozen the Count in 1974 and dressed him in Hawaiian shirts, you would have an image of the 'former dentist from New Jersey with a degree in public health from Harvard.'" she wrote.



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But Dickey's juvenile and admittedly "paranoid" condition-of-mind, that drew on "Sesame Street's Count," bears an uncanny resemblance to Jewish hate posters and eugenics propaganda that the founder of her Hearst-paymaster, William Randolph Hearst, encouraged while publishing support for the Nazis' "racial hygiene" "final solution" during the 1930s and 40s.

50) To accomplish her mission, Dickie heavily disparaged me in Article I. She began her attack with an anti-Semitic slur. She wrote, "Len bore a strong resemblance to the Count in Sesame Street if you had frozen the Count in 1974 and dressed him in a Hawaiian shirt." It is public knowledge that the Count

character in Sesame Street derives from Nazi stereotyping of wealthy evil Jews counting their money, as evidenced in the adjacent images.

51) This Hearst 'hit piece' then intentionally misrepresented OxySilver's ingredients. "Oxysilver . . . contained one listed ingredient: purified water, though its nutritional table also included 5 micrograms of colloidal silver." That is false. The OxySilver label does not say this. OxySilver contains nano-silver covalently-bonded to the oxygen in water. That is not "colloidal silver" that federal regulators have disparaged.

52) Dickie/Hearst also falsely published that I had attempted to "force a packet of papers into [the] hands" of the Hearst photographer [Dina Litovsky], and also into Dickie's hands. "Len wouldn't let me pass," Dickie falsely reported. 'Look at this!' he shouted, his face contorting with rage. . . . Larry Cook, . . . stepped in front of Len to keep him from lunging at me." Obviously, if I was so close to Dickie that she could not pass, Larry Cook could not have been able to step between us to prevent Dickie's imagined assault. Actually, all I did was extend an envelope containing papers of evidence from at least three or four feet away.

- 53) Dickie knew, should have known, but denied regardless, that Hearst was heavily invested in healthcare with partners that include the McKesson Group and the FirstData Bank (“FDB”). The former advertises itself as the “Central Nervous System of Healthcare,” and imposes standards of medical care nationwide, including through “MicroMD” with partner Henry Schein.
- 54) Dickie also concealed the most exciting emerging field in medicine that Hearst and its allies were investing in—*frequency therapeutics*! My hour-and-a-half lecture attended and disparaged by Dickie addressed this Hearst-concealed subject.
- 55) At the precise time Dickie typed her smears, dismissing my lecture on 528 frequency bioenergetics, and scoffing at my “crystal pyramids” (i.e., “528 Auto-Energizers” used for pain-relief), Pfizer’s former president and CEO, John LaMattina, began directing a company called “Frequency Therapeutics.”
- 56) In competition with my 528 bio-energetic technologies that rely on ‘structured water’ to positively-impact genetic expression, Frequency Therapeutics also developed bio-energetic genetic technologies. Neglecting this competition, and my AIDS science research unraveling HIV-1’s laboratory origin and genetic imposition, Dickie/Hearst published that “Leonard Horowitz theorizes AIDS is a genocidal weapon created by the government” and “sells crystal pyramids.”
- 57) The Defendants’ public/private Enterprise omits, denies, and fraudulently conceals its conflicting interests and investments in products and services that directly compete against my AIDS origin theory, my products, and bio-energetic services.
- 58) Hearst and its partners coordinated activities consistent with the objectives of the **National Biodefense Strategy Act of 2016 (“NBSA”)**.

59) The Defendants' Enterprise commenced disparaging, damaging and depriving me contemporaneously with the passage of that NBSA. Defendants' federal action torts include Sherman Act violations committed under color of that NBSA.

60) I am aware that the U.S. Supreme Court voided the "intra-enterprise conspiracy doctrine with respect to corporations and their wholly owned subsidiaries." But this did "not cripple antitrust enforcement" brought against co-conspiring presumably independent companies. *Copperweld Corp. v. Independence Tube Corp.*, 467 US 752 - Supreme Court 1984. In this vein, Justice Stevens wrote in dissent:

"[T]he question should be why two corporations that engage in a predatory course of conduct which produces a marketwide restraint on competition and which, as separate legal entities, can be easily fit within the language of § 1, should be immunized from liability because they are controlled by the same godfather. That is a question the Court simply fails to confront."

60) For all the above reasons and good cause shown, I request that the Court deny Hearst's Motion to Dismiss, and permit adjudication on the merits of my Claims for the administration of justice.

Further affiant sayeth not.

Dated: May 7, 2021

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Leonard G. Horowitz

# FLORIDA NOTARIAL CERTIFICATE

STATE OF FLORIDA  
LEE COUNTY

On this 7th day of May, 2021, I attest that the preceding statements are true to the best of my knowledge and belief. They are corroborated by exhibited evidence filed by me in this case. This sworn Affidavit in support of my Opposition filing details the facts I have witnessed as a person damaged by acts of unfair and deceptive trade and conspiracy to ruin my reputability and competitive commerce committed by the Hearst Corporation and its privies-in-interest in the aforementioned monopolistic Enterprise.

(Seal)

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Signature of Notary Public

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Print, Type or Stamp Name of

Notary