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IN THE HIGH COURT OF THE WESTERN CAPE

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Mag. Crt: 14/1198/08 [17/1384/07]  
CT.CAS: 1340/7/07 [Grg: 572/02]

Lara Johnstone	Applicant
And	
Magistrate Louw	First Respondent
Nat. Dir. Of Public Prosecutions	Second Respondent
» Hon. Patricia de Lille, MP, ID	Third Respondent
» Mr. Thabo Mbeki, Former President	Fourth Respondent
» Mr. Bulelani Ngcuka, Former NPA Nat. Dir.	Fifth Respondent
» Mr. J.S. Selebi, Former SAPS Comm.	Sixth Respondent
» Mr. BM Skosana, Former Min. Corrections	Seventh Respondent
» Mr. Nelson Mandela, Former President	Eighth Respondent
Minister of Citizenship & Immigration, Canada	Ninth Respondent
Per: Deputy Attorney General of Canada	
Per: United Nations High Commissioner for Refugees	
Per: Consulate General of Switzerland, Capetown	
The Nobel Institute: Norwegian Nobel Committee	Tenth Respondent
Per: Royal Norwegian Consulate, Capetown	

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Affidavit of Leonard George Horowitz evidencing the Origin of AIDS sourcing from Hepatitis B Vaccine experiments conducted by Agents and Agencies of the Federal Government of the United States of America and the Merck Pharmaceutical Company; in terms of Criminal Procedure Act 51, of 1977: § 213: Proof of Written Statement by Consent; & § 171 & 172: Evidence on Commission

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AFFIDAVIT OF LEONARD G. HOROWITZ

I, LEONARD GEORGE HOROWITZ, being first duly sworn on oath deposes and says:

1. This Affidavit is based on my personal knowledge, except where otherwise stated, and, if called upon to do so, I could and would competently testify to the matters herein stated.
2. I am an expert in the field of public health and emerging diseases by reason of academic trainings, scientific publications, and internationally recognized authority and celebrity in these fields.
3. I have reviewed the records and files cited herein.
4. I attest to the following facts that evidence a global genocide ongoing under the guise of AIDS science and "public health" (that is, an "iatrogenocide"); that is unconscionable in its implications that indicts the vaccine industry, vaccine research, and ongoing developments in this field.

5. I am the author of the scientific research textbook cited by former spiritual advisor to current U.S. President, Barack Obama, when defending claims that HIV/AIDS reflects a global genocidal conspiracy disproportionately damaging minority populations as per Anglo-American geopolitics and economic agendas.
6. This referenced text is titled, Emerging Viruses: AIDS & Ebola—Nature, Accident, or Intentional? (Tetrahedron, LLC, 1998). (Hereinafter it shall be referred to as “EV”.) Every original publication cited in this affidavit is reprinted clearly and unmistakably in this scientifically-referenced textbook that took me 3-years to research and write.
7. I attest that this book became the principle impetus for the U.S. General Accounting Office to investigate the theory that the Special Virus Cancer Program (SVCP) is the source of what we call HIV/AIDS today.
8. I attest that I was interviewed by USGAO investigators pertaining to this thesis, and that my testimony was entirely neglected by this agency when they issued their final report.
9. In fact, the USGAO lied when they reported that no one presented any credible evidence in-so-far-as the theory of HIV/AIDS originated in association with the SVCP.
10. Page 427 of EV reprints the US National Cancer Institute (NCI) publication entitled the “Special Virus Cancer Program,” Contract #NIH-71-2025 identified as the “Investigation of Viral Carcinogenesis in Primates.” The contractor is BIONETICS RESEARCH LABORATORIES; officiated by “NCI [National Cancer Institute] “Project Officers” Dr. Robert Gallo, Dr. Jack Gruber, and Dr. Roy Kinard of the NCI and Dr. Robert C.Y. Ting and Dr. John Landon of Litton Bionetics.”
11. Page 78 reprints a section of the US Congressional Record sourcing from the US Department of Defense showing this contractor, BIONETICS RESEARCH LABORATORIES, listed as a major biological weapons contractor for the US military.
12. Pages 423-426 of EV reprints the US National Institutes of Health, National Cancer Institute (NCI) Contract #NIH-69-2160 titled “Support Services for the Special Virus Cancer Program,” contractor BIONETICS RESEARCH LABORATORIES, Dr. Robert C.Y. Ting, Contractor’s Project Director.
13. Under the heading “Significance to Biomedical Research and the Program of the Institute” on this contracted (initiated June 27, 1969), it states: “This contract laboratory provides the opportunity for a systematic, large scale effort to detect viruses and/or viral antigens in human tumor materials (particularly leukemias and sarcomas), . . . This is a major objective of the [Special Virus Cancer Program] SVCP.”
14. On page 425, EV details this same contract in which it states American and African age and sex matched patients were compared using “seroepidemiological studies” comparing EBV [the Herpes B Epstein Barr Virus] titers in patients with Burkitt’s lymphoma, acute lymphocytic leukemia, and non-malignant diseases.”
15. Thus, it is scientifically-documented FACT this US military biological weapons contractor, BIONETICS, did investigate, and identify, certain viral agents in the tissues of Africans and Americans simultaneously between 1968 and 1971 fundamental to the cancer complex exclusively recognized today as the AIDS cancer complex.
16. Furthermore, this FACT is incriminating in that the leukemia, lymphoma, sarcoma cancer complex was not clinically identified or reported anywhere in the world until nearly a decade following this writing when initial AIDS cases began to appear in precisely these two countries (i.e., in gay Americans and central Africans).

17. Thus, I have requested my legal counsel, veteran US Constitutional Attorney, Larry Becraft, to issue notices through Freedom of Information Act actions, to obtain: A. "Any and all BIONETICS and National Cancer Institute documents describing laboratory procedures, and experimental methods and materials, used in service of contracts NIH-71-2025, and NIH-69-2160, pertaining to:
  - (A) virology, viral experiments, viral mutations, viral injections, viral injectables,
  - (B) Any and all records of experiments using primate subjects--human and subhuman--between 1968 and 1976; especially African and American persons and chimpanzees;
  - (C) Any and all records of experiments pertaining to leukemia, lymphoma, sarcoma cancers and cancer complex observations in the laboratories and/or clinics serving and/or affiliated in any way with BIONETICS RESEARCH LABORATORIES."
18. Furthermore, EV reprints on page 430-433 two Merck and Company, Inc. contracts, both referenced similarly as NIH-71-2059, but titled differently as follows: "Study of Viruses in Human and Animal Neoplasia" and "Oncogenic Virus Research and Vaccine Development." The "Contractor's Project Director" in both records is Dr. Maurice Hilleman. NCI Project Officer Dr. Jack Gruber, noted on the aforementioned BIONETICS RESEARCH LABORATORIES contract, is cited on this Merck pharmaceutical company contract as well.
19. This solid evidence links Merck and Company, Inc. to BIONETICS in service of these contracts to generate and test viruses and viral vaccines for the pre-AIDS non-existent leukemia-lymphoma-sarcoma cancer complex.
20. This Merck and Company, Inc. contract states its objective is "To conduct investigations designed to develop vaccines or other agents effective for the prophylaxis and therapy for human neoplasia of suspected viral etiology."
21. Page 141 of this official document (page 433 in EV) identifies "leukemia-sarcoma virus vaccine and herpesvirus type 2 vaccine" studies advancing "development of a feline-sarcoma virus vaccine and a herpesvirus type 2 vaccine . . . as rapidly as possible." Herpesvirus type 2 include the Epstein Barr Virus (EBV) that triggers lymphoma as uniquely seen associated with leukemias and sarcomas in AIDS patients.
22. At its onset, before 1980, as documented by premier AIDS historian Randy Shiltz, AIDS was considered by health officials at the US Centers for Disease Control & Prevention (CDC) to be a new feline-leukemia and hepatitis B-like immunological disease.
23. According to medical textbooks, EBV-associated tumors occur frequently in patients with AIDS. Lymphomas are the second commonest malignancy in AIDS patients. While scientific consensus holds that, "EBV triggers AIDS-associated primary CNS lymphoma (PCNSL) and post-transplantation lymphoproliferative disorder (PTLD). EBV DNA can be found in tumor tissue in both of these conditions[61] and in CSF of patients with AIDS-associated PCNSL." ([http://www.medscape.com/viewarticle/553327\\_5](http://www.medscape.com/viewarticle/553327_5))
24. Dr. Maurice Hilleman, identified by this Merck company contract, admitted during a censored media interview bringing the "AIDS virus" into north America in contaminated primates shipped from Africa by an unidentified primate supplier. This interview, that I obtained in audio only form from the National Library of Medicine, is currently playing on YouTube (Link to: <http://www.youtube.com/watch?v=edikvOzbAIU>)
25. According to other scientific documents in EV, Merck company hepatitis B vaccine trials were being conducted in African villagers and New York City using gay male volunteers, and at Willowbrook State School for mentally retarded children on Staten Island. The later trials were conducted under US Army contracts with the New York University Medical Center as directed by Dr. Saul Krugman.

26. Along with BIONETICS RESEARCH LABORATORIES, the New York University Medical Center is listed on the same, aforementioned, Congressional Record as being a US Military Biological Weapons Contractor. (See page 78 of EV.)
27. In this scientific exhibit it is evidenced that Dr. Hilleman discussed with Dr. Krugman collaborations that engaged the New York Blood Center in viral vaccine trials during the early 1970s. (See: Krugman S. "Viral hepatitis type B: Prospects for active immunization." In: International Symposium on Viral Hepatitis. Milan, Dec. 1974, Develop. biol. Standard. Vol. 30. Munich: S. Karger Basel, 1975, pp. VI; 363-367; the General Discussion can be found on pp. 375-379.)
28. The New York Blood Center maintained the Laboratory of Virology containing a "monkey facility" according to these documents. Here these suspects discussed the fact that their initial hepatitis B vaccine trials were conducted in chimpanzees.
29. This is material evidence because the closest relative, genetically identified, to HIV is the simian immunodeficiency virus from the chimpanzee (SIVcpz).
30. This SVCP-linked research directly preceded, and gave rise to, subsequent human and chimpanzee hepatitis B vaccine trials conducted in New York City involving the aforementioned laboratories, military contractors, Merck pharmaceutical company, homosexual men, and research collaborators at the NIH's National Institute for Allergies and Infectious Disease (NIAID) that evolved to become America's premier AIDS science agency.
31. America's leadership in the world of AIDS science followed HIV's (HTLV-I) alleged initial identification in 1984, by Dr. Robert Gallo—noteworthy since Dr. Gallo appears on the 1971 SVCP NCI/BIONETICS contract for the production and study of these never-before-seen leukemia/lymphoma/sarcoma immune-suppressive cancer complex viruses.
32. In 1974, during a virology symposium sponsored by the Gustav Stern Foundation, Dr. Robert Purcell and Dr. Saul Krugman, discussed their problems and progress in developing, what would later become, Dr. Hilleman's and Merck's hepatitis B vaccine. Dr. Purcell stated his failure to culture hepatitis B virus—the MS-2 strain that Dr. Krugman had pulled from "HAM," a mentally retarded child (apparently from the Willowbrook State School on Staten Island)—in human cell cultures. Likewise, rhesus monkey cell cultures failed to grow the monkey adapted hepatitis B virus. To overcome this problem, live chimpanzees were selected to grow all the different types of hepatitis B virus the researchers needed for their human experiments.
33. Page 247 of EV reprints Dr. Purcell's NIH, NIAID, grant summary evidencing this matter of chimpanzees used to develop hepatitis B vaccines for chimps and humans.
34. "To avoid duplication of experiments and wastage of seronegative [scarce and expensive] chimpanzees," Dr. Purcell's group wrote, "we are collaborating with Dr. Barker of the Bureau of Biologics, Food and Drug Administration [FDA], and Dr. Maynard of the Center for Disease Control [CDC], in an interagency study of hepatitis B infection in chimpanzees,"
35. Dr. Purcell continued, "A high priority of these studies is the establishment of pools of hepatitis B virus. . . . Human serum or plasma containing HBsAg of subtypes adw, ayw, adr, or ayr has been inoculated into chimpanzees. . . . The inoculum chosen to represent subtype ayw was serum supplied by Dr. Saul Krugman from the MS-2 pool of hepatitis B virus." (See: Moor-Jankowski J. Blood groups of apes and monkeys. Human and simian types. In: Research Animals in Medicine: National Heart and Lung Institute National Institutes of Health. Lowell T. Harmison, ed. Washington, DC: U.S. Department of Health,

36. Thus, it is important to determine three things:
  - (A) Did Dr. Gallo's collaborators at BIONETICS RESEARCH LABORATORIES ship chimpanzees to New York that were used in these hepatitis B vaccine experiments; and
  - (B) Did BIONETICS RESEARCH LABORATORIES purposefully, or inadvertently, contaminate chimpanzees shipped to New York that were used to grow hepatitis B vaccine viruses injected into New York humans between 1972-74 or even later before 1978 when the first AIDS cases were clinically diagnosed.
  - (C) Did simultaneous studies of this nature take place in Africa.
37. The answer to question one is provably "yes" as evidenced on page 446 of the affiant's textbook reprinting a Cold Spring Harbor Laboratory, 1980, publication proving American laboratories (Hazleton and Davis) "imported" their subhuman primates whereas only "LBI"—LITTON BIONETICS, INC. (a.k.a., BIONETICS RESEARCH LABORATORIES) administered African "colony-born" "C aethiops", that is, chimpanzees, as per their aforementioned contract, NIH-69-2160.
38. The answer to question two is provably "yes" as evidenced on page 457 wherein this SVCP BIONETICS reprinted reprint cites 11 primates were inoculated on behalf of Dr. Purcell's NIAID/NINCDS collaborators, Dr. W. Thomas London, and Dr. Baruch Blumberg, (under research grants CA-06551 and CA-08069, National Cancer Institute, National Institutes of Health) at The Institute for Cancer Research in Philadelphia, PA, with "AuAg"—the "Australiian Antigen" (a.k.a., hepatitis B virus) and 7 were transferred to Philadelphia according to this NIH/NCI/BIONETICS internal report.
39. Directly above this section discloses "Special Studies" conducted by BIONETICS RESEARCH LABORATORIES in 1970. (The term "Special" traditionally denotes "Secret" in military communities at that time.)
40. Here is evidence Dr. Robert Gallo, BIONETICS's co-investigator, and Project Director, John Landon, directed inoculations of "Misc V" (i.e., miscellaneous viruses obviously related to their SVCP focus on leukemia/lymphoma/sarcoma viruses) from "H"—Human, "S"—Simian (monkey/chimpanzee), and "F"—feline origins; contaminated 26 primates by inoculation in one study, and 3 in another; and thereafter, transferred 10 of these primates with human/simian mixed viruses, and 3 other primates infected with cat/simian mixed viruses, to some other location, most reasonably to cancer virus vaccine researchers in America and/or cancer labs in America.
41. The answer to question three is provably, "yes," as we know that BIONETICS RESEARCH LABORATORIES operated experimental programs and primate colonies in Uganda, Africa. Africa is the only place that C Aethops, the African chimpanzee, is living freely in colonies.
42. Besides this, NIH-69-2160, as testified above, detailed African and American patients being compared during these studies.
43. Additionally indicting evidence comes from a 1974 National Cancer Institute monograph including an incriminating graphic that is reprinted on page 114 of this expert affiant's textbook. This exhibit and accompanying monograph proves Uganda and Bethesda, specifically, were collaboration sites for herpes type virus (i.e., Epstein Barr, EBV) immunotoxic cancer virus research, and studies professed by Dr. Hilleman of the Merck drug company.

44. Dr. Hilleman disclosed hepatitis B vaccine trials sponsored by Merck, the NCI and the International Association for Research in Cancer, focused on novel experiments using varieties of cancer viruses including herpesviruses "seriously considered [to cause] Burkitt's lymphoma and nasopharyngeal carcinoma and possibly also cervical and prostatic neoplasia and Hodgkin's disease . . ."
45. Dr. Hilleman added, "The feline leukemia-sarcoma complex presents an excellent model in comparative oncology for testing . . . [the] spread of cancer and evaluating the effectiveness of vaccines. It is the prime model for RNA oncogenic viruses that is being pursued in our laboratories."
46. Dr. Hilleman also stated his collaborators' routine use of simian cancer viruses, two of which were herpesviruses—herpesvirus saimiri "recovered from kidneys of squirrel monkeys (*Saimiri sciureus*) and herpesvirus ateles isolated from kidney culture of a black spider monkey (*Ateles geoffrayi*)"—known to "cause lymphoma . . . and leukemia. . . . They are of special importance because of their possible use in elucidating the interactions among Epstein-Barr virus, Burkitt's lymphoma, and nasopharyngeal carcinoma in man." (See these two documents: Higginson J and Muir CS. Epidemiologic program of the International Agency for Research on Cancer. National Cancer Institute Monograph 1974;40:63-70; and Hilleman MR. Prospects for vaccines against cancer. In: Viruses, Evolution and Cancer—Basic Considerations. E. Kursak and K. Maramorosch eds. New York: Academic Press, 1974, pp. 549-560.)
47. Based on the aforementioned, and attached Special Virus Cancer Program Contract #NIH-71-2059] titled "Oncogenic Virus Research and Vaccine Development," officiated by Merck Pharmaceutical company vaccine chief, Dr. Maurice Hilleman, and "NCI "Project Officer" Dr. Robert Manaker, I have instructed my attorney Larry Becraft to obtain by Freedom of Information Act processes:
- (A) Any and all documents describing laboratory procedures, and experimental methods and materials, used in service of this contract;
  - (B) Any of the aforementioned pertaining to vaccinations and cancer, cancer virology, cancer virus production, methods of producing/propagating viruses for vaccine development, vaccine experiments, viral mutants used in vaccine experiments, viral vaccine injections, prepared viral vaccine injectables, all herpes type viruses and/or vaccines, viral hepatitis, viral hepatitis B, and/or viral hepatitis B vaccines;
  - (C) Evidence of experimental collaboration(s), including any and all memos thereof, between Dr. Maurice Hilleman and/or other Merck Company officials and:
    - a. Dr. Robert Manaker of the National Cancer Institute;
    - b. Employees or contractors at New York University Medical Center; especially Dr. Saul Krugman;
    - c. Dr. Robert Purcell and/or his collaborators at the National Institute for Allergies and Infectious Diseases;
    - d. NINCDs collaborators, especially Dr. W. Thomas London, and Dr. Baruch Blumberg, (under research grants CA-06551 and CA-08069, National Cancer Institute, National Institutes of Health) associated with The Institute for Cancer Research in Philadelphia, PA
  - (D) Any and all records of hepatitis B viruses and/or vaccines prepared using chimpanzees between 1968 and 1978;
  - (E) Any and all records of hepatitis B viruses and hepatitis B vaccines experimentally tested in primates, human and subhuman, especially children registered at the

Willowbrook State School for the mentally retarded on Staten Island, New York; and/or homosexual men in New York City between 1970 and 1976; and/or African villagers between 1970 and 1976.

48. Furthermore, based on the attached Special Virus Cancer Program Contract NIH-69-2160 entitled "Support Services for the Special Virus Cancer Program," officiated by BIONETICS RESEARCH LABORATORIES and their officials, Dr. Robert C. Y. Ting, and NCI Project Officer Dr. George Todero, please provide the following:
- (A) Any and all documents describing primate requisitions,
  - (B) Any and all documents describing colony safety,
  - (C) Any and all documents describing shipments of primates from primate colonies and cages in Uganda, Africa, to contractors in America between 1968 and 1978, especially in Falls Church, Virginia; Bethesda, Maryland; anywhere in Pennsylvania, especially Philadelphia, PA; anywhere in New York State, especially New York, New York; and/or the Southwest Foundation in San Antonio, TX;
  - (D) Any and all records of primate supply and shipping procedures, records of experiments on primates in these colonies under this contract, experimental methods and materials used on such primates (if any);
  - (E) Any and all documents describing shipments of primates and/or experimental primates, especially chimpanzees, to cancer research laboratories and/or vaccine production facilities globally, especially the:
    - a. Merck pharmaceutical company in the United States,
    - b. The Centers for Disease Control & Prevention (CDC),
    - c. The Food and Drug Administration (FDA), and
    - d. Other vaccine manufacturing entities in Marburg, Germany;
    - e. The Institute for Cancer Research in Philadelphia, PA
  - (F) Any and all documents pertaining to vaccinations and cancer, especially viral hepatitis B, viral hepatitis B vaccines, experimental collaboration(s) (and any memos thereof) between officials at Litton Bionetics, including:
    - a. Dr. Robert Gallo, and/or
    - b. Dr. Robert Ting, and/or
    - c. Dr. Maurice Hilleman and/or other Merck Company officials;
    - d. Employees or contractors at New York University Medical Center; including Dr. Saul Krugman;
  - (G) Any and all records of hepatitis B viruses, herpes viruses, "AuAg" and/or vaccines prepared using any of these viruses and/or chimpanzees in the aforementioned locations, by the aforementioned entities, between 1968 and 1976.
49. It is most prudent to additional notice the New York University Medical Center, the Merck Pharmaceutical Company, the FDA, the CDC, as well as The Institute for Cancer Research in Philadelphia, with this demand for documents under the Fol Act, as they all engaged in these studies between 1968 and 1974; and were involved the production of hepatitis B vaccines tested on primates, including Willowbrook State School mentally retarded children, gay men in New York City, and African villagers.

50. I declare under penalty of law that the foregoing is true and accurate.

DATED: August 22, 2009

  
Leonard George Horowitz  
State of ~~Idaho~~ <sup>California</sup>  
County of Orange

Subscribed and sworn to before me, this 2<sup>nd</sup> [day of month] day of  
September [month], 2009.

[Notary Seal:]



  
\_\_\_\_\_  
[signature of Notary]

Donna Helm  
\_\_\_\_\_  
[typed name of Notary]

NOTARY PUBLIC

My commission expires: November 23, 2009.