BREAKING: Dr. Sansone's Reply Brief to Governor DeSantis and Attorney General Moody

Writ of Mandamus Update

DR. JOSEPH SANSONE

JUL 29, 2024

This case is regarding a Writ of Mandamus I filed seeking to compel Governor DeSantis to prohibit the distribution of the mRNA injections in the state of Florida and to compel AG Moody to confiscate the vials.

I filed my Reply Brief on 7/29/2024. You can read it below. The Appellees (Governor Ron DeSantis and Attorney General Ashley Moody) have 30 days to file their Rely Brief. My Reply Brief is in response to the Appellees Answer Brief which was filed on 7/15/2024. The Appellees Answer Brief was in response to my Appellate Brief filed on 5/27/2024.

To recap...The original Emergency Petition for a Writ of Mandamus was filed on March 3rd, 2024, in the Florida Supreme Court. It was then transferred to the Circuit Court in Leon County on March 20th, 2024. On April 9th, 2024, the Circuit Court dismissed the case. The case is now in the appellate court. The Appellate Brief was filed on Memorial Day, May 27th, 2024. I filed an affidavit from the law professor that drafted the 1989 Biological Weapons and Antiterrorism Act stating that the mRNA nanoparticle injections violate 18 USC 175 CH 10 Biological Weapons and F.S. 790.166 on June 6th. On July 3rd the First District Court of Appeal issued an Order directing the Appellees to respond with an Answer Brief in 10 days or the Court would move forward and evaluate the evidence without it. I filed my objection to appellees request for 30 days on July 11,2024. The Court did issue an Order granting the 30 day extension, but it was moot because the deadline passed, and Appellees filed the Answer Brief on the deadline of July 15th.

Appellate Brief

Appellees Answer Brief

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You can read my Reply Brief below:

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IN THE DISTRICT COURT OF APPEAL

FIRST DISTRICT STATE OF FLORIDA

Joseph Sansone, M.S., PhD

Appellant

First DCA Case No.: 1D2024-1101

vs. **Lower Tribunal Case No.: 2024-CA-000488**

Hon. Ron DeSantis, in his Official Capacity of Governor of Florida; and Hon. Ashley Moody, in her official capacity of Attorney General of Florida,

Appellees

_____/

REPLY BRIEF OF JOSEPH SANSONE ON APPEAL FROM THE CIRCUIT COURT FOR THE SECOND JUDICIAL CIRCUIT IN AND FOR LEON COUNTY, FLORIDA

Respectfully Submitted
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A. There Is a Mountain of Evidence Which Necessitates a Trial–

Appellees/Respondents claim that there is no evidence is astounding and displays a callous disregard for human life. Floridians are literally dropping dead, getting cancer, heart attacks, strokes, neurological disorders,

autoimmune diseases, and the list goes on. Appellees statement on page 20 of the Answer Brief that, "The record on appeal shows no evidentiary hearing or trial has been noticed or held", speaks to the issue appellant has previously made multiple times that if the Appellees/Respondents dispute the *Facts of The Case* then a trial shall be held to determine the *Facts of The Case*. This Court should direct the Trial Court to have a trial to determine if the mRNA nanoparticle injections meet the legal criteria of weapons of mass destruction see Weapons and Firearms § 790.166 Fla. Stat. (2023). Also, in question are potential violations of, Treason § 876.32 Fla. Stat. (2023); Murder § 782.04 (1)(a) Fla. Stat. (2023); Florida Drugs and Cosmetic Act § 499.005 (2) Fla. Stat. (2023); Fraud § 817.034 Fla Stat. (2023); Accessory After the Fact § 777.03 Fla. Stat. (2023); and Florida Medical Consent Law § 766.103 Fla Stat. (2023).

Appellant/Petitioner made no claim that a trial has been conducted. Appellant/Petitioner has been advocating for a trial to determine the *Facts*

of The Case if the Court is unwilling to issue a peremptory or alternative mandamus. Appellant maintains that the application of the Substantial Competent Evidence Standard De Groot v. Sheffield, 95 So. 2d 912, 916 (Fla. 1957) toward the *Facts of The Case* in the mandamus is an appropriate method to evaluate the *Facts of The Case.* The abundance of evidence presented therein, which includes documents, studies, interviews, and statements, clearly surpasses the 'reasonable mind' threshold used in

the Competent Substantial Evidence Standard. There must be some method for the Court to determine if the *Facts of the Case* are frivolous or are plausible to support the complaint.

After providing a definition of the Competent Substantial Evidence Standard, on page 29 of the Amended Initial Appellate Brief, Appellant/Petitioner stated," Using the 'reasonable mind' criteria, this Court has clearly been provided Competent Substantial Evidence in the *Emergency Petition for a Writ of Mandamus*, of widespread disease, disability, and death, resulting from the COVID 19 injections. The *Emergency Petition for Writ of Mandamus* has also provided Competent Substantial Evidence of harm from 'shedding' from the COVID 19 injections."

Appellees/Respondents legal counsel should be aware that Appellant/Petitioner was applying the Competent Substantial Evidence Standard toward the *Facts of the Case* and applying the 'reasonable mind' criteria within that context and never indicated that there was a trial or hearing. Appellant/Petitioner is also the plaintiff and as such must inherently view his pleadings as evidence. A pro se litigant should also benefit from a liberal construction of the pleadings by the Court. Appellees/Respondents legal counsel's statement that Appellant/Petitioner was 'disingenuous' was improper and unprofessional coming from a

member of the Florida Bar and an Officer of the Court.

One of Appellant/Petitioner's arguments in the Initial Amended Appellate Brief, pages 25-28, and in prior pleadings, has been that the Trial Court erred by ignoring an abuse of a discretionary duty on behalf of Appellees/Respondents, by allowing Weapons of Mass destruction to be deployed against Floridians, leading to disease, disability, and death. Applying the 'reasonable mind criteria' of the Competent Substantial Evidence Standard toward the *Facts of the Case* in the mandamus justifies issuing a *peremptory* or an *alternative mandamus*, or conducting a **Trial** to determine the *Facts of The* Case. If the Appellees/Respondents dispute the *Facts of the Case* then a **Trial** is necessary. Holcomb v. Department of

Corrections, 609 So. 2d 751, 753 (Fla. 1st DCA 1992). Bal Harbour Village v. State ex rel. Giblin, 299 So.2d 611, 615 (Fla. 3d DCA 1974), cert. denied, 311 So.2d 670 (Fla. 1975).

Determining the *Facts of the Case* is integral to determining if there is an **abuse of a discretionary duty**. If the Court accepts the premise that biological and technological weapons are being deployed against 23 million Floridians, then it should be clear that ignoring the enforcement of Weapons and Firearms § 790.166 Fla. Stat. (2023), either through malfeasance or misfeasance, is an abuse of a discretionary duty and mandamus relief is appropriate. If the Appellees/ Respondents disagree with that premise, then there shall be a trial to determine the *Facts of the*

Case.

Appellant/Petitioner maintains that the Notice of Supplemental Authorities filed on 5/28/2024 and 6/19/2024 are not beyond the scope of Fla R. App. 9.225. The Affidavits filed on 5/28/2024 are not new argument or evidence. Each affidavit is essentially what was expressed in the original Mandamus by each individual. Dr. Francis Boyle, the law professor that publicly called for, and then drafted the U.S. domestic implementing legislation for the Biological Weapons Convention, known as the Biological Weapons Anti-Terrorism Act of 1989, that was approved unanimously by

both Houses of the U.S. Congress and signed into law by President George H.W. Bush, his private email is included on page 58 in the original Mandamus. Dr. Boyle, who is arguably the world's leading legal expert on biological weapons, states that the COVID injections are, "part of an offensive biological warfare weapons system that is existentially dangerous to the live, health, and wellbeing of the people of Florida. They must be terminated immediately!" Dr. Boyle's affidavit just offers this Court more clarity under oath. In his affidavit he states, "It is my expert opinion that, 'COVID-19 nanoparticle injections' or 'mRNA nanoparticle injections' or 'COVID-19 injections meet the criteria of biological weapons and weapons of mass destruction according to Biological Weapons 18 USC § 175; Weapons and Firearms § 790.166 Fla. Stat. (2023)."

In the case of Dr. Mihalcea, her affidavit is also merely echoing under oath what she stated in the original mandamus, in her interview footnoted on page 53, and her presentation footnoted on page 65. In the case of Dr. Villa, her affidavit is also merely echoing under oath, what she stated in the original mandamus in her interview footnoted on page 56. Karen Kingston's affidavit reflects her med-legal analysis on the COVID-19 mRNA injections cited throughout the *Statement of the Facts* (pages 15-54).

These affidavits are necessary to convey the gravity of the situation to the Court as the Trial Court appears to have ignored the *Facts of The Case* or it would have considered these arguments more seriously. The Trial Court did not have a hearing or trial to determine the *Facts of the Case* as requested. The Motion for Rehearing was filed on a Sunday April 21st and it was denied by approximately 10:35 AM on Monday April 22nd. This Court has the latitude to include these affidavits. In the interest of justice and public safety, the Court should include this pertinent data.

The Notice of Supplemental Authority filed on June 19 included Kansas v. Pfizer (US District Court for the District of Kansas, 2024) (pending), which was not initiated until after the Appellate proceedings began. While this is still a pending case, it should be treated as an authority. The State of Kansas asserts that Pfizer collaborated with the Federal Government as early as December 2020 to hide the lethal effects of the mRNA injections. This Court has the latitude to include this pending case as a supplemental authority and should exercise that authority as countless human lives are at stake.

B. **Separation of Powers Includes a Balance of Power and Fiduciary Duties–** Appellees/Respondents essentially argue that the Judicial branch of government is not empowered to decide whether mRNA nanoparticle

injections and technology violate; Weapons and Firearms § 790.166 Fla. Stat. (2023) and other mentioned laws. Appellees/Respondents essentially

Stat. (2023) and other mentioned laws. Appellees/Respondents essentially argue that the Court does not have the authority to compel the enforcement of laws when the lack of enforcement is leading to disease, disability, and death.

The Florida Constitution gives concurrent jurisdiction to the Circuit Court, Appellate Court, and Supreme Court, specifically for Writs of Mandamus regarding the Executive Branch of Government. Article V, § 3(b)(8) Florida Constitution, Article V, §4(b)(3) Florida Constitution and Article V, § 5(b) Florida Constitution.

As previously pointed out in the Amended Initial Appellate Brief, pages 25-28, it is appropriate to issue a writ of mandamus when there is an abuse of a discretionary duty, or as pointed out on pages 30-33, if Constitutional Rights are being violated, mandamus relief is also appropriate. Both are occurring.

The Judicial Branch of the government has a fiduciary duty to decide whether the mRNA nanoparticle injections violate Weapons and Firearms § 790.166 Fla. Stat. (2023); Murder § 782.04 (1)(a) Fla. Stat. (2023); and the other state laws mentioned. It is an inversion of the Florida Constitution and the United States Constitution for Appellees/Respondents to suggest that

immunity extends to the Appellees/Respondents when we are speaking of biological and technological weapons of mass destruction targeting 23 million Floridians.

Do the Appellees/Respondents really believe that their conduct is immune from Judicial Review to the point that they can lawfully look the other way when biological warfare targeting 23 million Floridians is leading to disease, disability, and death, of Floridians in mass?

Appellees argue on page 18 of their answer brief:

"Art. II, § 3, Fla. Const. Under separation of powers, the judicial branch must not interfere with the discretionary functions of the executive branch of government absent a violation of constitutional or statutory rights. Detournay, 127 So. 3d at 873; St. v. Bloom, 497 So. 2d 2 (Fla. 1986). See Cheney, 542 U.S. at 380, 390 (separation of powers implicated)."

This is precisely what Appellant/Petitioner has been arguing is occurring. The overturning of the *Chevron Deference* in LOPER BRIGHT ENTERPRISES v. Raimondo, No. 22-451 (U.S. June 28, 2024) Justice Thomas wrote, *"judicial power, as originally understood, requires a court to exercise its independent judgment in interpreting and expounding upon the laws."* Justice Gorsuch wrote, *"The reasonable bureaucrat always wins." And because the reasonable bureaucrat may change his mind year-to-year*

and election-to-election, the people can never know with certainty what new "interpretations" might be used against them. This "fluid" approach to statutory interpretation is "as much a trap for the innocent as the ancient laws of Caligula,"

The duty to interpret the law rests solely on the Judicial Branch of

government. Once Appellant/Petitioner filed the *Emergency Petition for a Writ of Mandamus* it was the duty of the Trial Court to determine if the law, particularly Weapons and Firearms § 790.166 Fla. Stat. (2023); Murder § 782.04 (1)(a) Fla. Stat. (2023); and the other laws cited, were being violated by the distribution of mRNA nanoparticle injections.

Appellees/Respondents claim on pages 19-20 of the Answer Brief, that granting this mandamus is an encroachment on Executive authority and a dangerous encroachment on the Separation of Powers, Article II, § 3, Florida Constitution, is incorrect. As already stated, the Florida Constitution empowers the Judicial Branch with the authority to issue mandamus directing the Executive Branch.

At issue is whether Appellees/Respondents are abusing a discretionary duty by allowing biological and technological weapons of mass destruction to target 23 million Floridians, and whether Constitutional Rights are being violated, by looking the other way while biological and

technological weapons of mass destruction are killing and disabling Floridians?

Appellees/Respondents claim that the Executive Branch of government can simply ignore the law and the State and Federal Constitution, to allow biological and technological weapons of mass destruction to be deployed against Floridians, and claim that the Judicial Branch has no oversight, is an attempt to turn Judicial Review on its head

Branch has no oversight, is an attempt to turn Judicial Review on its head. Marbury v. Madison, 5 U.S. 137, 178 (1803).

All that need be done is for this Court to determine that the act of allowing biological and technological weapons of mass destruction to be deployed against Floridians is a violation of the *Civil Rights* and *Basic Rights* enunciated in the Florida Constitution *"right to enjoy and defend life"* and rights protected by the United States Constitution. If the Judicial Branch has the power to declare a bill passed by the legislature and signed into law by the Executive Branch unconstitutional, it shall have the power to declare a reckless claim **ex post facto veto** power by the Executive Branch, unconstitutional.

It is a usurpation of Judicial and Legislative authority for the Executive Branch to claim that it can solely determine whether a law is being violated and whether it needs to be enforced. The sole duty of the Executive Branch

is to enforce the law. The Appellees are inviting this Court to render the Judicial and Legislative Branch irrelevant and create an Imperial Executive Branch with unlimited power, including the power to allow the murder of countless Floridian's without due process. Do we really want to reduce the Legislative and Judicial Branches of government to a ceremonial role similar to that of the ancient Roman Senate during its imperial age?

C. **Mandamus Relief is Appropriate** – As enunciated on pages 25-28 of the Amended Initial Appellate Brief, mandamus can be used to compel

members of the Executive Branch in Florida to perform a non-discretionary duty to address an **abuse of discretion**. While the Executive Branch has broad discretion in enforcing laws, a Court may issue a mandamus to compel action. This applies particularly when the failure to act is arbitrary or capricious leading to disease, disability and death, thus constituting an abuse of discretion. See Cheney v. U.S. Dist. Court for D.C, 542 U.S. 367, 390 (2004). Hunter v. Solomon, 75 So. 2d 803 (Fla. 1954). Salameh v. FLORIDA DEPARTMENT OF HEALTH, No. 1D21-985 (Fla. Dist. Ct. App. Sept. 29, 2021). Hunter v. Solomon, 75 So. 2d 803 (Fla. 1954). Allen v. Rose, 123 Fla. 544, 167 So. 21, 23. Permenter v. Younan, 159 Fla. 226, 230 (Fla. 1947). State ex Rel. Evans v. Chappel, 308 So. 2d 1, 3 (Fla.

1975). Hialeah v. State ex rel. Danels, 97 So. 2d 198 (Fla. Dist. Ct. App. 1957).

As enunciated on pages 30-32 of the Amended Initial Appellate Brief, mandamus should also be used to protect Constitutional Rights see; Beacon Theatres, Inc. v. Westover, 359 U.S. 500, 79 S. Ct. 948, 3 L. Ed. 2d 988 (1959). Smith v. Hooey, 393 U.S. 374, 89 S. Ct. 575, 21 L. Ed. 2d 607 (1969). Sweatt v. Painter, 339 U.S. 629, 70 S. Ct. 848, 94 L. Ed. 1114 (1950). Garner v. Louisiana, 368 U.S. 157, 82 S. Ct. 248, 7 L. Ed. 2d 207 (1961). Califano v. Yamasaki, 442 U.S. 682, 99 S. Ct. 2545, 61 L. Ed. 2d 176 (1979). Mitchell v. Moore, 786 So. 2d 521 (Fla. 2001). Bounds v.

Smith, 430 U.S. 817, 825, 97 S. Ct. 1491, 52 L.Ed.2d 72 (1977). State v. City of Lakeland, 112 Fla. 200, 206 (Fla. 1933).

As enunciated on pages 33-39 of the Amended Initial Appellate Brief, Appellees/Respondents have a clear legal duty to act and protect basic Constitutional Rights that are protected in the Florida Constitution. Gawker Media, LLC v. Bollea, 170 So. 3d 125 (Fla. Dist. Ct. App. 2015).

Article IV, § 1(a) Florida Constitution, "The supreme executive power shall be vested in a governor, who shall be commander-in-chief of all military forces of the state not in active service of the United States. The governor shall take care that the laws be faithfully executed, commission all

officers of the state and counties, and transact all necessary business with the officers of government." Article IV, § 4(b) Florida Constitution states "The attorney general shall be the chief state legal officer". Article 1, § 2 Florida Constitution enunciates the "right to enjoy and defend life". Ignoring laws that cause Floridians to suffer from disease disability add death, is a clear abuse of a discretionary duty.

If case law is placed on an equal footing as legislation/statutory law, then Justice Marshall's statement applies to both, "a law repugnant to the constitution is void", Marbury v. Madison, 5 U.S. 137, 178 (1803). A myopic interpretation of case law that is contrary to, or ignores the Constitution, is invalid on its face. Justice Gorsuch makes strong arguments against blind allegiance to case law precedent and deference to protecting Constitutional Rights in LOPER BRIGHT ENTERPRISES v. Raimondo, No. 22-451 (U.S. June 28, 2024).

Appellant/Petitioner has exhausted all legal remedies available. Prior to filing the mandamus, in addition to facilitating approximately 10 County Republican Parties to declare the COVID 19 injections biological and technological weapons, and call for their prohibition, in July of 2023, the Appellant/Petitioner provided 67 County Sheriffs, 20 State Attorneys, as well as the Attorney General and Governor, evidence that the COVID

injections cause harm and are weapons of mass destruction, calling for their immediate halt. This evidence was also sent certified mail on approximately October 6, 2023, to the Governor and Attorney General. On February 7, 2024, a final demand letter was sent to the Governor and Attorney General. These efforts were ignored. see Appendix in *Emergency Petition for Writ of Mandamus*.

On January 3, 2024, the Florida Department of Health called for a Halt to mRNA injections, Surgeon General Ladapo specifically stated "DNA integration poses a unique and elevated risk to human health and to the integrity of the human genome"[1].

This case clearly is **an issue of exceptional importance**, and an **issue of first impression**. Mandamus relief is appropriate in such an instance. This Court "only need to ferret out whether, the record contains — or if counsel raised in their briefs — a clear derogation from binding precedent, a decisional conflict, **an issue of exceptional importance, or an issue of first impression"**….. "Mandamus should lie in circumstances when a lower court … "refuses to recognize an issue of exceptional importance, because, without this ameliorative remedy, novel issues

[1] Bulletin Florida Department of Health (01/03/2024 08:30 AM EST) "Florida State Surgeon General Calls for Halt in the Use of COVID-19 mRNA Vaccines" (Tallahassee, Florida.) https://content.govdelivery.com/accounts/FLDOH/bulletins/3816863

affecting the rights of Florida's population may never reach this state's highest court"[2] [emphasis Appellant/Petitioner]

highest court." [emphasis Appellant/Petitioner]

It is unreasonable to claim that the use of biological and technological weapons of mass destruction against 23 million Floridians is not both an ***issue of first impression*** and an issue of ***exceptional importance***.

Appellant/Petitioner has 1 - a clear legal right to **not** be targeted with biological and technological weapons of mass destruction, 2 – seeks to compel the performance of an indisputable legal duty on part of the respondents to stop the distribution of these weapons that are leading to disease, disability, and death, violating the Basic Rights enunciated in the Florida Constitution, 3 – there is no other adequate legal remedy, as to date, no entity or public official of the State of Florida will act responsibly to protect the public.

Prosecutorial discretion is irrelevant as Appellant/Petitioner is not seeking criminal investigations, indictments, or prosecutions in the mandamus or subsequent pleadings. Appellees/Respondents apparent claims that enforcement of Weapons and Firearms § 790.166 Fla. Stat. (2023); Murder § 782.04 (1)(a) Fla. Stat. (2023); and other state laws, falls

[2] THE EXTRAORDINARY REMEDY OF MANDAMUS: A CREATIVE SOLUTION TO FORMIDABLE JURISDICTIONAL HURDLES. Florida Bar Journal David Wolff. Vol. 90, No. 2 February 2016 Pg 10

within the jurisdiction of the FDA is absurd on its face. The State of Kansas is asserting that the Federal government is involved in hiding the lethal effect of these injections. Equally astounding is Appellees/Respondents

claim they have no Constitutional duty to protect Floridians from weapons of mass destruction or murder. The mRNA nanoparticle injections, at a minimum, violate State laws previously cited, Article 1, § 2 Florida Constitution, "The Constitution of the United States," Amendment 5., Nuremberg Code, and the Declaration of Helsinki, of which the United States considers itself bound.

D. **Pro se litigant** – Appellant/Petitioner is a pro se litigant and the Court should allow a liberal construction of these pleadings and deference as to violations of the Rules of Civil Procedure because Appellant/Petitioner is the litigant. Appellant/Petitioner has been substantially compliant with the Rules of Civil Procedure and Appellate Rules of Procedure. Appellant/Petitioner filed an affidavit with this Court on 7/16/2024 curing any verification issues on prior pleadings. The Amended Initial Appellate Brief is essentially the same as the Initial Appellate Brief. Due to a scrivener's error the Trial Court was listed on the Initial Appellate Brief. Out of respect for this Court the Appellant/Petitioner corrected it.

Appellees/Respondents are attorneys and missed the 30 day deadline to file an Answer Brief without asking for an extension…

As a pro se litigant Appellant/Petitioner is also the plaintiff and need only allege damages as it relates to violations of Civil Rights, and it is Appellant/Petitioner's statements as to violations of rights that are being

litigated. Appellant/Petitioner has affirmed violations of Civil Rights, the Trial Court should have had a trial to establish the *Facts of The Case* as requested in these pleadings.

E. **Standard of Review** – Only by ignoring or disputing the facts of the case can Appellees/Respondents claim Appellant/Petitioner has no standing. Appellant/Petitioner clearly has standing as does all 23 million Floridians that were targeted by biological and technological weapons of mass destruction, either directly through injection, or via shedding. As previously stated in these pleadings, in April of 2023, Appellant/Petitioner while in congestive heart failure having difficulty breathing and speaking, awaiting triple bypass heart surgery, overcame extraordinary logistical hurdles to find blood donors that were not injected with mRNA nanoparticles. As already stated in these pleadings, there is credible evidence that the blood supply is contaminated and poses a serious health risk.

Mandamus is an extreme remedy, however, the use of biological and technological weapons of mass destruction against 23 million Floridians is more extreme. This is both an ***issue of first impression***, and ***of exceptional importance***.

Appellant/Petitioner has established, 1 - a clear legal right, 2 – seeks to compel the performance of an indisputable legal duty on part of the respondents, 3 – there is no other adequate legal remedy. The Trial Court

erred by failing to recognize this.

The Trial Court erred by specifically stating that mandamus relief can not be granted to compel a discretionary duty. As stated above, mandamus relief may be granted if there is an abuse of a discretionary duty or if Constitutional Rights are being violated. Determining the *Facts of the Case* is integral to whether there is an abuse of a discretionary duty or if Constitutional Rights are violated.

Conclusion

The mandamus requests that the Court compel Appellee/DeSantis to prohibit the distribution of mRNA nanoparticle injections; compel Appellee/Moody to confiscate the vials; and conduct a forensic analysis. As was pointed out in these pleadings and in the trial Court pleadings, the Court can disregard the request to order a forensic analysis if that is

considered directing the manner of how the Appellees conduct their duties. The Court also has the power to the power to grant the request to compel the prohibition and confiscation of the vials.

The Trial Court erred by not recognizing this case is an ***issue of first impression*** and of ***exceptional importance*** affecting the lives and health of 23 million Floridians. Trial Court erred by not recognizing that mandamus is appropriate when there is an abuse of discretionary duty. The Trial Court erred by not applying the 'reasonable mind' criteria of the Competent Substantial Evidence Standard toward the *Facts of the Case*. The Trial

Court erred by not recognizing mandamus is appropriate relief for Constitutional Rights violation. Trial Court erred by not recognizing Appellees clear legal duty to act.

Once again, on behalf of the dead and the dying, and those that will die in the future from being targeted with mRNA nanoparticle injections which are weapons of mass destruction, Appellant prays that this court will remand this case back to the Trial Court and either direct the Trial Court to issue a peremptory mandamus or alternative mandamus to prohibit the distribution of the mRNA nanoparticle injections, and confiscate the vials, or order a Trial to determine the facts of this case.

Respectfully Submitted,

/s/ Joseph Sansone

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35 Comments

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Pamela Burns Jul 29 ♥ Liked by Dr. Joseph Sansone

🙏 May God be With You & This Effort!!!

LIKE (16) REPLY SHARE

Paul Vonharnish Jul 29 ♥ Liked by Dr. Joseph Sansone

Well done Joseph Sansone. The crux of the matter are well described on pages 14, 15, and 16 of your reply Brief. The lower court is obviously ignorant, incompetent, or grandly corrupt...

It is also interesting that no County Sheriff with Constitutional authority has come forward to enforce the Law. To them, Mr DeSantis must be a 'good' racketeer...

LIKE (10) REPLY SHARE

3 replies

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