

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF ARKANSAS
FORT SMITH DIVISION**

Maxis Richards

Plaintiff,

v.

Federal Bureau of Investigation (FBI)

Defendant.

Civil Action No. _____

**COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF, MANDAMUS, AND
DAMAGES**

NATURE OF THE CASE

This case challenges the FBI's knowing complicity in, and deliberate refusal to investigate, clandestine electromagnetic and neurotechnological operations conducted against a civilian U.S. citizen by the National Security Agency and affiliated intelligence elements.

Plaintiff brings this action to compel the FBI to admit its knowledge of these unlawful operations, to perform its statutory duty to investigate federal crimes and civil rights violations, and to obtain justice for the FBI's role as a co-conspirator in ongoing physical, psychological, and constitutional harm.

This complaint is supported by verified 2026 congressional testimony, Pentagon disclosures, and mainstream investigative reporting confirming that the technologies Plaintiff describes are actively developed, tested, and deployed by the U.S. government. The FBI, as the nation's principal federal investigative agency, possesses both jurisdiction and mandatory duty to investigate these crimes. Instead, it has concealed its knowledge, suppressed complaints, and acted as a gatekeeper to prevent accountability.

The FBI is sued not merely for passive failure, but for active complicity: it has received complaints, possesses investigative files, and has willfully refused to investigate or refer these matters for prosecution, thereby becoming a co-conspirator in the deprivation of Plaintiff's constitutional rights.

I. INTRODUCTION

This is a civil action for declaratory and injunctive relief, writ of mandamus, compensatory and punitive damages, and other appropriate relief to address grave violations of Plaintiff's constitutional rights, civil liberties, and international human rights.

Plaintiff brings this suit against the Federal Bureau of Investigation (FBI) for:

1. Its knowing concealment of classified electromagnetic and neurological experimentation upon civilians conducted by the NSA and related agencies;
2. Its deliberate refusal to investigate Plaintiff's repeated complaints of non-consensual surveillance, psychological and neurological manipulation, physical pain, sleep deprivation, and mental torture via advanced neurotechnological and satellite-based systems;
3. Its role as a co-conspirator in depriving Plaintiff of constitutional rights by acquiescing to, and actively covering up, these operations;
4. Its violation of mandatory statutory duties to investigate torture, civil rights violations, and federal crimes under color of law.

Plaintiff publicly refers to the underlying program as Project Puppet and reasonably believes it is internally designated as Project Signal.

As the principal investigative arm of the Department of Justice, the FBI has a non-discretionary duty to investigate allegations of federal crimes, including torture, civil rights violations, and unlawful surveillance. By refusing to investigate, the FBI has obstructed justice, concealed felonies, and enabled the ongoing harm.

II. JURISDICTION AND VENUE

Jurisdiction is proper in this Court pursuant to:

- 28 U.S.C. § 1331 (federal question)
- 28 U.S.C. § 1361 (mandamus jurisdiction to compel agency action unlawfully withheld)
- 5 U.S.C. § 552 (Freedom of Information Act)
- 5 U.S.C. § 552a (Privacy Act)
- 42 U.S.C. § 1983 (civil rights violation)
- 18 U.S.C. § 2340A (torture under color of law)
- 18 U.S.C. § 4 (misprision of felony)

Venue is proper in the Western District of Arkansas under 28 U.S.C. § 1391(e), as Plaintiff resides in Fort Smith, Arkansas.

III. PARTIES

Plaintiff: Maxis Richards

- U.S. citizen residing in Fort Smith, Arkansas
- Date of Birth: [REDACTED], 1980
- Social Security Number: [REDACTED]-9746

Defendant: Federal Bureau of Investigation (FBI)

Address:

935 Pennsylvania Avenue NW
Washington, DC 20535-0001

IV. FACTUAL BACKGROUND

A. The FBI's Statutory Duty to Investigate

The FBI is mandated by federal law to investigate:

- Federal crimes, including violations of 18 U.S.C. §§ 241–242 (conspiracy against rights and deprivation under color of law);
- Torture and cruel, inhuman, or degrading treatment under 18 U.S.C. § 2340A;
- Civil rights violations and domestic surveillance abuses;
- Anomalous Health Incidents (AHIs) and directed energy attacks upon U.S. persons, as confirmed by the Bureau's own 2026 participation in the Interagency AHI Task Force.

The FBI has established jurisdiction, personnel, and infrastructure to receive and investigate complaints from U.S. citizens alleging federal crimes. Plaintiff has repeatedly submitted complaints to FBI field offices and headquarters detailing the precise violations alleged herein. The FBI has acknowledged receipt, assigned internal tracking numbers, and thereafter deliberately suppressed investigation.

B. The 2026 Government Acknowledgment of Directed Energy Neuroweapons

The factual predicate underlying Plaintiff's complaints—directed energy weapons, brain-computer interface technology, and electromagnetic neuroweapons—is no longer speculative. In 2026, the U.S. government made unprecedented admissions:

1. The Pentagon's Acquisition and Testing of a Suspected Havana Syndrome Device

In January 2026, CNN and CBS News reported that the Defense Department acquired and tested a portable directed-energy device linked to Havana Syndrome. The device generates pulsed radio waves, fits inside a backpack, and contains Russian-manufactured components. A March 8, 2026 60 Minutes investigation confirmed the U.S. government acquired this weapon through a Russian criminal network and has been testing it on animals, with tests showing injuries consistent with Havana Syndrome symptoms.

2. Congressional Investigation of Anomalous Health Incidents

On May 20, 2026, the Senate Armed Services Committee received a classified briefing on anomalous health incidents, examining whether American personnel are being targeted by directed energy weapons. Senators Jeanne Shaheen and Susan Collins wrote to Defense Secretary Pete Hegseth on February 2, 2026, warning against sidelining the Pentagon's Cross-Functional Team investigating AHIs, noting that over 300 U.S. government personnel had qualified for care.

3. Expert Confirmation of Microwave/Radiofrequency Causation

Dr. David Relman, a Stanford University professor of medicine who led two government-requested investigations into AHIs, testified that "the most plausible explanation for a subset of these cases was a form of radiofrequency or microwave energy." He confirmed that such energy could cause loss of consciousness, seizures, memory lapses, inability to concentrate, headaches, intense pressure, pain, disorientation, and difficulty with balance—symptoms identical to those reported by Plaintiff.

4. Pentagon Directed Energy Weapons Development in 2026

The Department of Defense is actively developing and demonstrating directed energy weapons. In 2026, the Pentagon awarded \$86 million in contracts for laser weapons, demonstrated multiple high-energy laser and high-power microwave systems at White Sands Missile Range, and is investing in "tens to hundreds" of directed energy weapons for operational deployment.

5. Brain-Computer Interface Military Deployment

In 2026, brain-computer interface (BCI) technology has advanced to military application. Non-invasive BCIs enabling neural monitoring and cognitive state detection are being

integrated into military platforms. Military BCI research explicitly includes "non-consensual neural monitoring" and "weaponization of stimulation capabilities" as recognized dual-use concerns.

6. The Microwave Auditory Effect (V2K) Is Scientifically Established

The "microwave auditory effect" (Frey effect)—wherein pulsed microwave radiation induces audible sounds directly within the human head without receiving equipment—is well-documented. First reported during World War II and formally studied by Allan H. Frey in 1961, the effect occurs via thermoelastic expansion of cranial tissues. The U.S. Navy explored weaponizing this effect through the MEDUSA program (Mob Excess Deterrent Using Silent Audio).

C. The FBI's Knowledge and Complicity

The FBI has actual and constructive knowledge of these operations through multiple channels:

1. FBI Participation in AHI Investigations

The FBI has been a named participant in interagency investigations of Anomalous Health Incidents since 2022. It has received classified briefings, reviewed intelligence, and interviewed victims. The Bureau therefore possesses direct knowledge that directed energy weapons are operational, have been used against U.S. persons, and cause the precise symptoms Plaintiff reports.

2. FBI Receipt of Plaintiff's Complaints

Plaintiff has submitted formal complaints to FBI field offices and the FBI Headquarters Civil Rights Unit, Criminal Division, and Domestic Terrorism/Operations Sections. These complaints detailed:

- Non-consensual electromagnetic surveillance and targeting;
- Voice-to-Skull (V2K) transmissions;
- Remote Neural Monitoring (RNM);
- Directed Energy Weapon attacks causing physical pain and neurological injury;
- Satellite-based tracking and behavior modification.

The FBI acknowledged receipt, assigned complaint numbers, and thereafter willfully refused to investigate, refer, or report these matters.

3. FBI's Historical Role in Concealing Non-Consensual Experimentation

On June 30, 2026, the House Oversight Committee's Task Force on the Declassification of Federal Secrets held a hearing on the CIA's MKUltra experiments. The hearing confirmed that U.S. intelligence agencies have repeatedly engaged in non-consensual human experimentation, destroyed evidence, and evaded accountability. The FBI, as the federal investigative agency with concurrent jurisdiction over federal crimes committed by intelligence agencies, has historically failed to investigate these programs and has instead acted to discredit complainants and conceal evidence.

4. The FBI's Duty to Report and Investigate Federal Crimes

Under 18 U.S.C. § 4, whoever, having knowledge of the actual commission of a felony cognizable by a court of the United States, conceals and does not as soon as possible make known the same to some judge or other person in civil or military authority under the United States, shall be fined under this title or imprisoned not more than three years, or both.

The FBI, having actual knowledge of felonies including torture, conspiracy against rights, and deprivation of rights under color of law, has violated this statute by concealing rather than investigating and reporting these crimes.

D. Plaintiff's Targeting and the FBI's Refusal to Act

The NSA, through classified technologies and global satellite networks, has targeted Plaintiff with non-consensual electromagnetic and neurological interference. The FBI knows or has reason to know of these operations through:

- Its own AHI investigations;
- Plaintiff's repeated complaints;
- Intelligence sharing with the NSA and Pentagon;
- Publicly available patent evidence and technical documentation.

Despite this knowledge, the FBI has:

- Refused to open a formal investigation;
- Refused to refer the matter to the Department of Justice for prosecution;
- Refused to notify Congress or the courts as required by its oversight obligations;
- Actively concealed the existence of these programs from the public and from judicial oversight;
- Retaliated against or ignored other complainants raising identical allegations.

Plaintiff has experienced years of:

- Involuntary muscle movement and organ distress
- Sleep deprivation via pulsed microwave interruptions
- V2K harassment and synthetic telepathy
- Chronic anxiety, depression, memory impairment, and disorientation

The FBI's refusal to investigate has prolonged and enabled these injuries, converting passive knowledge into active complicity.

V. LEGAL CLAIMS

A. Mandamus — Compelled Investigation and Admission

Under 28 U.S.C. § 1361, this Court has jurisdiction to compel an agency to perform a duty owed to Plaintiff. The FBI has a clear, non-discretionary duty to:

- Investigate allegations of federal crimes, including torture and civil rights violations;
- Refer credible evidence of federal crimes to the Department of Justice;
- Maintain accurate records of complaints received;
- Disclose its knowledge of directed energy and neuroweapon operations targeting U.S. civilians.

The FBI has unlawfully withheld this action. Plaintiff is entitled to a writ of mandamus compelling the FBI to:

1. Admit its knowledge of electromagnetic and neurotechnological targeting programs affecting U.S. civilians;
2. Open a formal criminal investigation into Plaintiff's targeting;
3. Refer all evidence of torture, conspiracy, and civil rights violations to the Department of Justice;
4. Produce all records reflecting FBI knowledge of Project Puppet, Project Signal, or related programs.

B. Constitutional Violations — Conspiracy and Acquiescence

- Fourth Amendment — By knowingly permitting and concealing unlawful searches and seizures, including brainwave monitoring and electromagnetic tracking, the FBI has become a co-conspirator in these violations.

- Fifth Amendment — By concealing and refusing to investigate the deprivation of liberty, bodily autonomy, and due process, the FBI has deprived Plaintiff of equal protection and due process.
- Eighth Amendment — By acquiescing to the infliction of cruel and unusual punishment without conviction or trial, and by refusing to investigate torture allegations, the FBI has violated Plaintiff's rights.

C. Statutory Violations

- 18 U.S.C. §§ 2340–2340A — Torture under color of law; the FBI's failure to investigate constitutes complicity in torture.
- 42 U.S.C. § 1983 — Deprivation of civil rights by a government entity through conspiracy, deliberate indifference, and failure to investigate.
- 18 U.S.C. §§ 241–242 — Conspiracy against rights and deprivation under color of law; the FBI is a co-conspirator by concealing these crimes.
- 18 U.S.C. § 4 — Misprision of felony; the FBI, having knowledge of felonies, has concealed and failed to report them.
- 5 U.S.C. § 552 (FOIA) — Failure to disclose records reflecting FBI knowledge and investigation of these matters.
- 5 U.S.C. § 552a (Privacy Act) — Failure to disclose and correct records maintained on Plaintiff.

D. International Law Violations

- United Nations Convention Against Torture (CAT) — The FBI's refusal to investigate torture allegations violates the obligation to prevent, investigate, and punish acts of torture.

VI. PATENT EVIDENCE AND TECHNICAL CORROBORATION

Publicly available U.S. patents confirm the feasibility of these technologies:

- US Patent 3,951,134 — Apparatus and method for remotely monitoring and altering brain waves
- US Patent 6,011,991 — Nervous system manipulation via electromagnetic fields
- US Patent 6,506,148 — Control of the nervous system through electromagnetic fields

The FBI, as a technically sophisticated agency with forensic laboratories and scientific expertise, has the capacity to evaluate and corroborate this evidence. Its refusal to do so is deliberate and pretextual.

VII. PROGRAM HISTORY AND CONTEXT

Programs leading up to this include:

- Project MKUltra — CIA's mind control experiments (confirmed by 2026 congressional hearing)
- Project Pandora — Electromagnetic frequency weapon research
- Stargate Program — Government remote viewing/mind-influence operations
- ECHELON / SHAMROCK / TURBINE — NSA surveillance architectures

The FBI has historically received reports of these programs and has consistently refused to investigate, instead acting to protect intelligence agencies from accountability. The 2026 MKUltra hearing confirmed that the destruction of records in 1973 was "obstruction of justice" and "criminal destruction of federal records," yet the FBI did not investigate or prosecute.

VIII. FOIA & PRIVACY ACT REQUEST

Under 5 U.S.C. § 552 (FOIA) and 5 U.S.C. § 552a (Privacy Act), Plaintiff demands the immediate release of:

- All records referencing Plaintiff's current and former name
- All complaints, tips, or reports submitted by or concerning Plaintiff
- All FBI investigative files, intelligence reports, or threat assessments concerning electromagnetic or directed energy targeting of U.S. civilians
- All records of FBI participation in AHI or Havana Syndrome investigations
- All communications between the FBI and NSA, CIA, DOD, or DOJ concerning Project Puppet, Project Signal, or electromagnetic neuroweapons
- All records reflecting FBI knowledge of remote neural monitoring, V2K, or BCI technologies
- All records of FBI interviews with AHI victims or directed energy complainants

IX. DEMANDS FOR RELIEF

Plaintiff respectfully demands:

1. A declaratory judgment that the FBI's failure to investigate is unlawful and unconstitutional;
2. A writ of mandamus compelling the FBI to admit its knowledge of electromagnetic and neurotechnological targeting programs and to commence a formal investigation;
3. A permanent injunction prohibiting the FBI from further concealing, destroying, or ignoring evidence of these operations;
4. Compensatory damages for mental and physical injury proximately caused by the FBI's deliberate indifference and complicity;
5. Punitive damages to deter further obstruction of justice and concealment of federal crimes;
6. Appointment of a special master or oversight committee to audit FBI files and compel disclosure;
7. Disclosure of all FBI records related to AHI investigations, directed energy weapons, and civilian targeting.

X. INTENT TO FILE CRIMINAL COMPLAINT

Plaintiff reserves the right to file a formal criminal complaint with:

- The United States Department of Justice (DOJ) Office of the Inspector General
- The United Nations Special Rapporteur on Torture
- The Senate Judiciary Committee (given its oversight of the FBI)
- The Senate Armed Services Committee (given its ongoing 2026 investigation of directed energy weapons)

XI. REQUEST FOR JURY TRIAL

Plaintiff hereby demands a trial by jury on all issues so triable pursuant to the Seventh Amendment of the U.S. Constitution.

XII. CERTIFICATION

I certify under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief.

XIII. PUBLIC NAME VS INTERNAL NAME

The term "Project Puppet" is the public designation assigned by Plaintiff. Plaintiff does not possess the internal classification used by the NSA or FBI, but believes it may correspond to the internal codename Project Signal, based on research and whistleblower information.

XIV. LITIGATION HOLD REQUEST

Plaintiff demands that the FBI preserve all relevant records, including:

- Complaint logs and tip-line records
- Intelligence reports and threat assessments
- Emails, memoranda, and classified communications with NSA, CIA, DOD, and DOJ
- AHI investigation files and victim interview records
- Electromagnetic signals and surveillance data in FBI possession
- AI decision logs and biometric data
- All records related to electromagnetic or directed energy weapon testing
- Any data related to FBI Headquarters or field office handling of Plaintiff's complaints

Failure to preserve this data may result in sanctions for spoliation of evidence.

XV. PUBLIC INTEREST AND ONGOING HARM

This is not an isolated incident. The 2026 disclosures regarding Havana Syndrome/Anomalous Health Incidents confirm that directed energy weapons can and have been used to cause neurological harm to Americans. The Pentagon's acquisition of such a device, the Senate Armed Services Committee's classified investigation, and over 1,500 reported AHI cases demonstrate that electromagnetic neuroweapons are operational realities.

The FBI's deliberate refusal to investigate these matters—and its active concealment of its knowledge—constitutes a matter of profound public interest, warranting urgent judicial and Congressional oversight. The FBI cannot be permitted to act as a shield for unlawful intelligence operations rather than as the investigative agency mandated by law.

XVI. PERSONAL HARM AND DAMAGES

As a result of the FBI's unlawful concealment and refusal to investigate, Plaintiff has endured:

- Severe psychological trauma, including anxiety, depression, and paranoia
- Loss of income and employment due to cognitive interference
- Social isolation due to forced behavioral disruptions
- Chronic physical pain and sleep deprivation
- Emotional harm from the inability to live without intrusion, compounded by the FBI's denial of justice and protection

These injuries have been prolonged and exacerbated by the FBI's deliberate indifference and active complicity.

XVII. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court:

1. Declare the FBI's failure to investigate unconstitutional and unlawful;
2. Issue a writ of mandamus compelling the FBI to admit its knowledge of electromagnetic, neurological, and satellite-based targeting programs and to commence a formal criminal investigation into Plaintiff's targeting;
3. Enter a permanent injunction enjoining the FBI from concealing, destroying, or ignoring evidence of these operations;
4. Order the FBI to disclose all records related to Plaintiff under FOIA and the Privacy Act, including any AHI, directed energy, or targeting records;
5. Order the FBI to refer all evidence of torture, conspiracy, and civil rights violations to the Department of Justice for prosecution;
6. Award compensatory and punitive damages in an amount to be determined at trial;
7. Award costs and reasonable attorney's fees pursuant to 5 U.S.C. § 552(a)(4)(E);
8. Order the preservation and production of all FBI records related to directed energy weapons, BCI technologies, and civilian targeting;
9. Grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

Maxis Richards