

**IN THE DISTRICT COURT OF APPEAL FIRST DISTRICT, STATE OF  
FLORIDA**

**Joseph Sansone, M.S., PhD**

**Appellant**

**vs.**

**Case No.: 1D2025-3368**

**L.T. Case No.: 2024-CA-001977**

**HON. RON DESANTIS, in his Official**

**Capacity of Governor of Florida; and**

**HON. James Uthmeier, in his Official**

**Capacity of Attorney General of Florida,**

**Appellees**

\_\_\_\_\_ /

**NOTICE OF SUPPLEMENTAL AUTHORITY – DOJ- EPSTEIN - DARPA**

Appellant Joseph Sansone, pursuant to Florida Rule of Appellate Procedure 9.225, respectfully submits this Notice of Supplemental Authority to bring to the Court's attention to newly identified primary source documents from the United States Department of Justice Epstein Files Transparency Act (EFTA) release, which were recently identified and reported by investigative journalists in March 2026, after Appellant's initial brief was filed. These documents are directly relevant to the novel

constitutional issues raised in this appeal and to the grounds for reversal set forth in Appellant's Initial Brief.

**I. THE DOJ EPSTEIN FILES CONFIRM THAT A CONVICTED SEX OFFENDER ORCHESTRATED A SEVEN-YEAR CAMPAIGN TO INFILTRATE DARPA'S mRNA WEAPONS AND VACCINE PROGRAM — THE SAME PROGRAM THAT PRODUCED THE PRODUCTS APPELLEES ARE FACILITATING IN FLORIDA.**

The Defense Advanced Research Projects Agency (DARPA) Biological Technologies Office (BTO) is the United States military's primary research division for biological weapons and dual-use biological technologies. Beginning in 2011, DARPA's ADEPT program invested in mRNA-based vaccine technology and awarded Moderna its foundational approximately \$25 million grant, the investment that enabled Moderna's subsequent development of the mRNA COVID-19 injection that Appellees are currently promoting and distributing in Florida.<sup>1</sup>

---

<sup>1</sup> DARPA ADEPT Program: Congressional Research Service, "Defense Advanced Research Projects Agency: Overview and Issues for Congress," updated August 19, 2021; Jared Adams, "Pandemic Prevention Platform (P3)," DARPA Program Information, <https://www.darpa.mil/program/pandemic-prevention-platform>.

The DOJ Epstein files now confirm that Jeffrey Epstein, a convicted sex offender who reportedly operated a pedophile blackmail operation targeting politicians and business leaders, and whom a 2020 FBI report in the DOJ files identifies, based on a confidential informant, as having been “close to the former Prime Minister of Israel, Ehud Barak” and as a “co-opted” agent of a foreign intelligence service <sup>2</sup>, conducted a sustained, seven-year campaign to infiltrate and influence DARPA's biological technologies program. The following primary source documents, identified by investigative journalists in March 2026, establish this campaign in Epstein's own words and in the words of his associates:

## **II. THE PRIMARY SOURCE DOCUMENTS.**

November 23, 2010, Epstein Directs His Agent to "Arrange the DARPA Lady" (EFTA01984564, Exhibit A). On November 23, 2010, Epstein emailed Boris Nikolic, Gates' science adviser, directing him to arrange a meeting with a senior female DARPA official, referred to in the

---

<sup>2</sup> A 2020 FBI report contained in the DOJ Epstein files cites a confidential informant who stated that Epstein "was close to the former Prime Minister of Israel, Ehud Barak," had "trained under" a foreign intelligence service, and was a "co-opted" intelligence asset. See TRT World, "Newly released US government documents reveal FBI informant became convinced Epstein was co-opted Mossad agent," February 4, 2026; Politics Today, "FBI Informant Claimed Epstein Was Israeli Spy, Document Shows," February 5, 2026; Al Jazeera, "What were Jeffrey Epstein's links to Israel?," February 9, 2026. Israeli officials, including Prime Minister Netanyahu, have denied these allegations.

email only as "the DARPA lady": "either the week of the 29th or the 14th lets see if we can arrange the DARPA lady, ask her is she comes to New York.." <sup>3</sup> The identity of this official is not disclosed in the document; investigative journalists have identified her as the DARPA Director at the time based on her position. This is the earliest documented evidence of Epstein's direct effort to access DARPA leadership, routed through Gates' own science adviser.

April 6, 2015, DARPA BTO "Offer" Reported to Epstein (EFTA02505180, Exhibit B). On April 6, 2015, a redacted individual emailed Epstein: "Want to talk about darpa Offer." <sup>4</sup> The sender, whose identity is redacted in the DOJ files, was treating Epstein as the person to whom career decisions at the United States military's biological technologies division were to be reported.

April 9, 2015, "Yes DARPA Just a Question of When", and "Both Bill and Jim Want Me to Stay Connected" (EFTA02505006, Exhibit C). Three days later, the same individual confirmed to Epstein: "Yes darpa just a question of when." The email also states: "Both bill and Jim want me to stay connected and advising for some of my time=till mid 2017 (end of first term

---

<sup>3</sup> EFTA Document EFTA01984564, Email, Jeffrey Epstein to Boris Nikolic, November 23, 2010. Available at <https://www.justice.gov/epstein/files/DataSet%2010/EFTA01984564.pdf>.

<sup>4</sup> EFTA Document EFTA02505180, Email, [redacted] to Jeffrey Epstein, April 6, 2015. Available at <https://www.justice.gov/epstein/files/DataSet%2011/EFTA02505180.pdf>.

at Bank).”<sup>5</sup> The reference to “bill”, in the context of this individual's advisory role and their prior connection to Seattle, is consistent with Bill Gates, whose science adviser (Nikolic) was the same individual Epstein had used to pursue the DARPA meeting in 2010.

April 27, 2015, The Weapons Acknowledgment Email: “Each of These as You Know Could Translate into Weapons” (EFTA01746408, Exhibit D). On April 27, 2015, the same individual sent Epstein a detailed outline of their proposed DARPA BTO program application. The proposed research programs included vagal modulation (immunity through vagal nerve stimulation for nervous system disease and cardiac implications), metabolic sensing, and contraception via olfaction. The email then states: “Each of these as you know could translate into weapons - some more aggressive than others.”<sup>6</sup> The phrase “as you know” is not a disclosure, it is a reference to a prior conversation in which the weaponization potential of these biological research programs had already been discussed between the sender and Epstein. The email further attributes the program's guiding vision to Epstein personally: “Turning science fiction into science fact...’ (Your idea!)” This is the most direct evidence in the EFTA corpus of

---

<sup>5</sup> EFTA Document EFTA02505006, Email, [redacted] to Jeffrey Epstein, April 9, 2015. Available at <https://www.justice.gov/epstein/files/DataSet%2011/EFTA02505006.pdf>.

<sup>6</sup> EFTA Document EFTA01746408, Email, [redacted] to Jeffrey Epstein, April 27, 2015. Available at <https://www.justice.gov/epstein/files/DataSet%2010/EFTA01746408.pdf>.

Epstein's involvement in the development of a DARPA biological weapons program application, with acknowledged dual-use weapons potential.

February 24, 2017, The bgC3 Workplan: Epstein Editing Gates' Private Office's Pandemic Preparedness Platform (EFTA02658424, Exhibit E). On February 24, 2017, Epstein emailed a redacted associate at bgC3, Bill Gates' private strategic advisory office, directing how the associate should frame their workplan.<sup>7</sup> The workplan itself, formally addressed in its confidentiality footer to “JEE” (Jeffrey E. Epstein), listed as a key deliverable a “Complete digital platform for the Strain simulation exercise”, a pandemic preparedness tool. The workplan's resources section specified: “Reliance on Gates team expertise wherever relevant.” The named partners included Geoff Ling, identified parenthetically as “(DARPA)”, the official who had founded DARPA's Biological Technologies Office, the division housing the mRNA vaccine program. The confidentiality footer was addressed exclusively to “JEE”, Jeffrey E. Epstein, confirming that Epstein was the principal to whom this Gates-office work product was being submitted.

---

<sup>7</sup> . EFTA Document EFTA02658424, Email and workplan, Jeffrey Epstein to [redacted] bgC3 associate, February 24, 2017. Available at <https://www.justice.gov/epstein/files/DataSet%2011/EFTA02658424.pdf>.

### **III. THE DARPA-mRNA PIPELINE FLOWED DIRECTLY INTO THE GATES FOUNDATION — AND THEN INTO THE PRODUCTS APPELLEES ARE FACILITATING.**

The connection between DARPA's mRNA program and the products Appellees are facilitating in Florida is not theoretical. Dan Wattendorf, the DARPA program manager who built the ADEPT mRNA vaccine program and oversaw the \$25 million foundational grant to Moderna, left DARPA in 2016 and became Director of Innovative Technology Solutions at the Bill and Melinda Gates Foundation. That same year, the Gates Foundation gave Moderna \$20 million. In 2019, the Gates Foundation gave BioNTech \$55 million, the company that produced the Pfizer mRNA injection.<sup>8</sup> The DARPA program manager who built the military's mRNA pipeline moved directly into the philanthropic infrastructure that funded its commercial development, with Epstein embedded at the junction of both.

The uncontested expert affidavits in this record, including the affidavit of Dr. Francis A. Boyle, J.D., Ph.D., the author of the Biological Weapons

---

<sup>8</sup> Dan Wattendorf biographical note, CASSS On Demand, <https://ondemand.casss.org/b/sp/dan-wattendorf-2101> ("Prior to joining the Foundation in 2016, Dan was Program Manager at the Defense Advanced Research Projects Agency (DARPA) where he initiated and led" the ADEPT mRNA program); Moderna Therapeutics press release, "Moderna Therapeutics, Through Valera, Announces Initial Grant of Up to \$20 Million" from the Bill & Melinda Gates Foundation, January 12, 2016; Bill & Melinda Gates Foundation, "In September 2019, we invested \$55 million in [BioNTech]'s company because we thought that the mRNA technology they were developing had great potential."

Anti-Terrorism Act of 1989, who states that mRNA COVID-19 injections meet the statutory criteria of biological weapons of mass destruction, must now be read in light of the documentary evidence that the mRNA technology pipeline originated in DARPA's biological weapons research division, was developed with the acknowledged understanding that it “could translate into weapons,” and was commercialized through a philanthropic infrastructure in which a convicted pedophile and blackmail operator served as a strategic intermediary.<sup>9</sup>

#### **IV. RELEVANCE TO GROUNDS FOR REVERSAL.**

These newly identified primary source documents are directly relevant to the following grounds for reversal set forth in Appellant's Initial Brief:<sup>10</sup>

---

<sup>9</sup> See Affidavit of Dr. Francis A. Boyle, J.D., Ph.D. (R. 94); Affidavit of Karen Kingston (R. 124); Affidavit of Dr. Ana Maria Mihalcea, M.D., Ph.D. (R. 116); Affidavit of Dr. Avery Baron Brinkley Jr., M.D. (R. 135); Affidavit of Dr. Andrew Zywiec, M.D. (R. 129); Affidavit of Dr. Rima E. Laibow, M.D. (R. 181); Affidavit of Dr. Marivic Villa, M.D. (R. 187); Affidavit of Dr. Ben Marble, M.D. (R. 196); Affidavit of Dr. Paul Elias Alexander, Ph.D. (R. 200). All nine affidavits were submitted in the prior uncontested appeal (Case No. 1D24-3305), in which Appellees did not participate, and are part of the public record of this Court.

<sup>10</sup> Sayer Ji, "The DARPA Layer: How Jeffrey Epstein Wired Himself Into the Pentagon's Pandemic Preparedness Infrastructure," GreenMedInfo.com, March 2026, <https://greenmedinfo.com/content/darpa-layer-how-jeffrey-epstein-wired-himself-pentagons-pandemic-preparedness->.

**Ground H** — Novel Issues of Great Public Importance: Whether Appellees' promotion and facilitation of biological and technological weapons of mass destruction, products whose mRNA technology originated in DARPA's biological weapons research division, was developed with acknowledged weapons potential, and was commercialized through a network in which a convicted pedophile and blackmail operator served as a strategic intermediary, violates Floridians' constitutional rights under Art. I, §§ 2, 9, and 23 of the Florida Constitution is a novel issue of the greatest public importance that has never been addressed by any Florida court. The trial court dismissed this case without allowing a single witness to testify or a single document to be introduced into evidence.

**Ground G** — Improper Factual Resolution at Pleading Stage: The trial court characterized Appellant's detailed factual allegations as “conclusory” and dismissed them without accepting them as true, as required under the motion-to-dismiss standard. The EFTA documents now confirm, from primary source government records, that the factual predicate of Appellant's allegations, that the mRNA technology pipeline was developed through a network that included DARPA's biological weapons division and

a convicted criminal operating as a strategic intermediary, is supported by documentary evidence that the trial court never permitted to be developed.

## **V. CONCLUSION.**

The DOJ Epstein files establish that the mRNA technology pipeline, from DARPA's biological weapons research division to the Gates Foundation to the commercial products Appellees are promoting and distributing in Florida, was coordinated in part through a convicted sex offender reportedly running a pedophile blackmail operation targeting politicians and business leaders, whom the FBI's own files identify as a suspected foreign intelligence asset, and who acknowledged, in writing, that the biological research programs he was helping to develop “could translate into weapons.” The nine uncontested expert affidavits in this record, submitted in a prior uncontested appeal (Case No. 1D24-3305) in which Appellees did not participate, and which are part of the public record, characterize these products as biological and technological weapons of mass destruction constituting crimes against humanity. Appellees' continued facilitation of these products, in the face of this evidence and the official warnings of Florida's own Surgeon General, presents novel

constitutional questions of the greatest public importance that this Court must not allow to be extinguished by a sua sponte dismissal entered without notice, without a hearing, and with an emergency motion for injunctive relief pending. This Court should reverse and remand with instructions for evidentiary development and assign a new judge for this case for reasons stated in Appellant's Initial Brief.

Dated: March 15, 2026

Respectfully submitted,

/s/ Joseph Sansone

Joseph Sansone, M.S., PhD

Appellant, pro se

27499 Riverview Center Blvd.

Bonita Springs, FL 34134

239-444-1774

[DrJosephSansone@Gmail.com](mailto:DrJosephSansone@Gmail.com)

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished on 3/15/2026 by electronic service through the Florida Courts E-Filing Portal and by electronic mail to counsel of record, in accordance with Florida Rule of Judicial Administration 2.516 and Florida Rule of Appellate Procedure 9.420, at the addresses listed below:

EMILY J. WITTHOEFT

ASSISTANT ATTORNEY GENERAL

Florida Bar No.1039542

Office of the Attorney General

PL-01 The Capitol

Tallahassee, FL 32399-1050

[Emily.Witthoeft@myfloridalegal.com](mailto:Emily.Witthoeft@myfloridalegal.com)

[complexlitigation.eservice@myfloridalegal.com](mailto:complexlitigation.eservice@myfloridalegal.com)

P: 850-414-3669

Counsel for Appellees

/s/ Joseph Sansone      3/15/2026

Joseph Sansone, M.S., PhD, Appellant/Plaintiff

27499 Riverview Center Blvd.

Bonita Springs, FL 34134

239-444-1774

[DrJosephSansone@Gmail.com](mailto:DrJosephSansone@Gmail.com)

# EXHIBIT 'A'

**To:** Boris Nikolic [REDACTED]  
**From:** Jeffrey Epstein  
**Sent:** Tue 11/23/2010 11:41:45 AM

either the week of the 29 th or the 14th lets see if we can arrange the DARPA lady,, ask her is she comes to New York..

--

\*\*\*\*\*

The information contained in this communication is confidential, may be attorney-client privileged, may constitute inside information, and is intended only for the use of the addressee. It is the property of Jeffrey Epstein

Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify us immediately by return e-mail or by e-mail to [jeevacation@gmail.com](mailto:jeevacation@gmail.com), and destroy this communication and all copies thereof, including all attachments.

---

**From:** [REDACTED] >  
**Sent:** Monday, April 6, 2015 10:13 PM  
**To:** Jeffrey Epstein  
**Subject:** In town April 30/31

Nyc??

Want to talk about darpa

Offer

```
<?xml version="1.0" encoding="UTF-8"?>
<!DOCTYPE plist PUBLIC "-//Apple//DTD PLIST 1.0//EN" "http://www.apple.com/DTDs/PropertyList-1.0.dtd">
<plist version="1.0">
<dict>
  <key>conversation-id</key>
  <integer>120166</integer>
  <key>date-last-viewed</key>
  <integer>0</integer>
  <key>date-received</key>
  <integer>1428358379</integer>
  <key>flags</key>
  <integer>8590195717</integer>
  <key>gmail-label-ids</key>
  <array>
    <integer>6</integer>
    <integer>2</integer>
  </array>
  <key>remote-id</key>
  <string>495120</string>
</dict>
</plist>
```

---

**From:** [REDACTED]  
**Sent:** Thursday, April 9, 2015 10:48 PM  
**To:** Jeffrey Epstein  
**Subject:** Oh

And since no phone time

Yes darpa just a question of when

Both bill and Jim want me to stay connected and advising for some of my time=till mid 2017 (end of first term at Bank). Can be a day a week or just an h=ur each morning etc.

And I'm starting to attend at Hopkins As early as summer - got credentials a=d will join the vascular service which is combo neurology and neurosurgery (=nd I guess neuro radiology although they don't manage patients). Not gonna d= SEATTLE attending once I move to Hopkins. Have been going on Tuesdays and t=ey asked me for a bigger commitment. Which feels super nice.

Plus some other cool stuff to talk about

```
<?xml version=.0" encoding=TF-8"?>
<!DOCTYPE plist PUBLIC "-//Apple//DTD PLIST 1.0//EN" "http://www.apple.com/DTDs/PropertyList-1.0.dtd">
<plist version=.0">
<dict>
  <key>conversation-id</key>
  <integer>119765</integer>
  <key>date-last-viewed</key>
  <integer>0</integer>
  <key>date-received</key>
  <integer>1428619657</integer>
  <key>flags</key>
  <integer>8590195713</integer>
  <key>gmail-label-ids</key>
  <array>
    <integer>6</integer>
    <integer>2</integer>
  </array>
  <key>remote-id</key>
  <string>496059</string>
</dict>
</plist>
```

# EXHIBIT 'D'

**From:** [REDACTED]  
**Subject:** Re: When  
**Sent:** Monday, April 27, 2015 11:56:01 AM  
**To:** "jeffrey E." <jeevacation@gmail.com>

Place  
DARPA  
BTO (the team I would work)

Role  
Manager (can pick theme...but I think I would call it)  
Sensing, detection and modulation

Vision  
Something like a personal philosophy  
"Turning science fiction into science fact..." (Your idea!)

Neat benevolent applications I would do  
...Metabolic sensing (co localized imaging technologies and post processing to avoid need for biopsy, use of end tidal breath for status monitoring)

...contraception via olfaction (immune mediated noninvasive stimuli)

... Vagal modulation (immunity through vagal afferents for nervous system disease, selective or transdermal stim for range of pathology, cardiac Implications of direct parasympathetic infection)

Each of these as you know could translate into weapons - some more aggressive than others

Thoughts?

On Apr 27, 2015, at 12:46 PM, jeffrey E. <jeevacation@gmail.com> wrote:

yup

On Mon, Apr 27, 2015 at 7:45 AM, [REDACTED] > wrote:

Can't I'm sitting on a panel right now representing Jim in London but done this evening w this meeting around 6pm London time and can try then??

HOW ARE YOU?  
All ok!?!?

On Apr 27, 2015, at 12:42 PM, jeffrey E. <jeevacation@gmail.com> wrote:

unlikely at themmoment. call me now [REDACTED]

On Mon, Apr 27, 2015 at 7:25 AM, [REDACTED] >

wrote:

Might I be able to see you?

Want to talk about cool science and DARPA and HOPKINS

?

Will you be in NYC on Thursday or Friday morning ?

--

please note

The information contained in this communication is confidential, may be attorney-client privileged, may constitute inside information, and is intended only for the use of the addressee. It is the property of JEE

Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify us immediately by return e-mail or by e-mail to [jeevacation@gmail.com](mailto:jeevacation@gmail.com), and destroy this communication and all copies thereof, including all attachments. copyright -all rights reserved

--

please note

The information contained in this communication is confidential, may be attorney-client privileged, may constitute inside information, and is intended only for the use of the addressee. It is the property of JEE

Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify us immediately by return e-mail or by e-mail to [jeevacation@gmail.com](mailto:jeevacation@gmail.com), and destroy this communication and all copies thereof,

including all attachments. copyright -all rights reserved

---

**From:** jeffrey E. <jeevacation@gmail.com>  
**Sent:** Friday, February 24, 2017 4:15 AM  
**To:** [REDACTED]  
**Subject:** Re: what about this?

crypto health

On Fri, Feb 24, 2017 at 4:20 AM [REDACTED] > wrote:

Please know this will get scrutinized and also be used a very rigid "workplan".

Focus areas

1. Digital health=security
2. Neurotechnolog=es and brain science

Scope of work

Identify experts, evaluate data, explore policy/regulato=y implications and build from existing recommendations towards deliverables

Deliverables

- \* \*=-A0 (Digital healt= security)

<=pan>o Blueprint for = zero knowledge proof based digital system to secure personal healt= information providing privacy but also access to digitally redacted persona= information.

<=pan>o Learning sessi=n(s) with cybersecurity and blockchain experts

<=pan>o Complete digit=l platform for the Strain simulation exercise

- \* \*=-A0 (Neurotechnolo=ies and brain science)

<=pan>o Whitepaper on =eural substrates for chronic and degenerative disease

o Learning sessi=n(s) with neurotechnologists and brain scientists

Resources

- \* \*=-A0 Domestic and/o= international travel related to efforts

\* \* =A0 Reliance on Ga=es team expertise wherever relevant

\* \* =A0 Ad hoc analyti=al and administrative support

#### Partners and Immediate Advisory Support

\* \* =A0 Individuals=/u>

<=pan>o Nandan Nilekan= (and team/Aadhaar), Geoff Ling (DARPA), Paul Greengard (Nobel Laureate, Rockefeller), Linda Buck (Nobel Laureate, Fred Hutchison Cancer Center), Yann LeCun (convolutional nets, Facebook), Todd Park (former CTO of the USA)

\* \* =A0 (other) Instit=ions

o WEF Global Fut=re Council on Blockchain, WEF Global Future Council on Neurotechnology and Brain Science, Lauder Foundati=n, Mayo Clinic, Kaiser Permanente, Stanford (Shenoy Lab), Caltech (Koch Lab)=u>

--

=C2◆ please note

The information co=tained in this communication is confidential, may be attorney-client pr=vileged, may constitute inside information, and is intended only for

JEE

Unauthorized use= disclosure or copying of this communication or any part thereof is str=ctly prohibited and may be unlawful. If you have received this commu=ication in error, please notify us immediately by return e-mail or by e-mail to jeevaca=ion@gmail.com <mailto:jeevacation@gmail.com> , and destroy this communication and all copies thereo=, including all attachments. copyright -all rights reserved

</=iv>