

1 moved from office on impeachment for, and conviction of,
2 treason, bribery, or other high crimes and misdemeanors”.
3 In his conduct as Secretary of Health and Human Serv-
4 ices, Robert F. Kennedy Jr. has abused the powers of his
5 office and failed to faithfully execute the laws of the
6 United States, in violation of his constitutional oath and
7 his duty under article II, section 3, of the Constitution.
8 By doing so, Robert F. Kennedy Jr. has imperiled the
9 health and safety of the American people, eroded public
10 confidence in the Nation’s public health institutions, and
11 stalled decades of scientific and medical progress.

12 In his conduct as Secretary of Health and Human
13 Services, Robert F. Kennedy Jr. has disregarded statutory
14 requirements of his office by failing to abide by Federal
15 law, including the Patient Protection and Affordable Care
16 Act (42 U.S.C. 18001 et seq.) and title XIX of the Social
17 Security Act (42 U.S.C. 1396 et seq.), which threatens
18 the public health and safety of the American people
19 through the diminished capacity of the Nation’s public
20 health institutions as follows:

21 (1) Robert F. Kennedy Jr. conducted far-reach-
22 ing, haphazard reduction in force (hereinafter re-
23 ferred to as “RIF”) including during the ongoing
24 lapse of appropriations, which have diminished pub-
25 lic health capacity across the Department of Health

1 and Human Services (hereinafter referred to as
2 “DHHS”) resulting in lawsuits and haphazard rein-
3 statement actions. Robert F. Kennedy Jr. falsely
4 testified to Congress that these reductions in force
5 did not terminate any “working scientists,” despite
6 overwhelming evidence that key staff managing pro-
7 grams and leading public health scientists were in-
8 cluded, endangering public health, delaying bio-
9 medical innovations, and inciting confusion among
10 public health professionals.

11 (2) Robert F. Kennedy Jr. unilaterally ceased
12 public comment on various types of Federal adminis-
13 trative rules and orders in violation of the Adminis-
14 trative Procedures Act. Such elimination runs at
15 odds with Robert F. Kennedy Jr.’s own statements
16 to improve public transparency while also reducing
17 key oversight and consultation avenues used by Con-
18 gress and public health officials on significant Fed-
19 eral actions.

20 (3) Robert F. Kennedy Jr. terminated employ-
21 ees across the National Institutes of Health (herein-
22 after referred to as “NIH”), the Centers for Disease
23 Control and Prevention (hereinafter referred to as
24 “CDC”), and the Food and Drug Administration
25 (hereinafter referred to as “FDA”) responsible for

1 meeting statutory requirements with respect to
2 record keeping and fulfilling requests for public
3 records eligible under Federal laws, including the
4 Freedom of Information Act. These terminations di-
5 minished oversight and transparency across the Na-
6 tion's public health enterprise and are impeding
7 Congress' ability to conduct effective oversight.

8 (4) Robert F. Kennedy Jr. celebrated the publi-
9 cation of the "Make America Healthy Again" report,
10 which repeatedly cited false, misleading, or non-ex-
11 istent research and misrepresented existing scientific
12 findings, seeding confusion among the public and
13 policymakers and imperiling the health and well-
14 being of children across the United States. Such
15 false citations are also in violation of Federal re-
16 search integrity standards and the established norms
17 of the scientific community.

18 (5) Robert F. Kennedy Jr. baselessly attacked
19 the FDA, including going so far as to suggest reor-
20 ganization and closure of key programs. These at-
21 tacks erode public trust in a key regulatory agency
22 designed to protect public health while reducing ca-
23 pacity to carry out statutory requirements.

24 (6) Robert F. Kennedy Jr. announced that the
25 FDA would unilaterally approve the use of leucov-

1 orin, a chemotherapy drug approved for cancer
2 treatment, to treat symptoms of autism. Such a
3 move is in violation of administrative procedures re-
4 garding the approval of novel treatment methods by
5 the FDA, including insufficient scientific evidence of
6 any such risks or adverse effects the use of leucov-
7 orin poses to children’s health.

8 (7) Robert F. Kennedy Jr. impaired the Fed-
9 eral response to the avian influenza outbreak despite
10 overwhelming evidence of a health crisis in the Na-
11 tion’s poultry stock, which led to the culling of mil-
12 lions of commercial birds. Robert F. Kennedy Jr.
13 dismissed the scientific and general public concern
14 regarding the escalating outbreak, repeated inflam-
15 matory statements such as suggesting the virus
16 “should be allowed to run its course,” and failed to
17 uphold the Federal Government’s responsibility of
18 managing the crisis, thus endangering food security
19 and public health.

20 Robert F. Kennedy Jr. has undermined the United
21 States leadership in medical innovation and endangered
22 the future of public health through the cancellation of
23 Federal research grants, shuttering congressionally au-
24 thorized programs, and withholding funds, which violated

1 article 1 of the United States Constitution and the “power
2 of the purse” by Congress as follows:

3 (1) Robert F. Kennedy Jr. has cancelled more
4 than 2,600 biomedical research grants at NIH total-
5 ing \$8.9 billion in Federal funding loss for the pub-
6 lic health research enterprise. Additionally, over \$1.5
7 billion in NIH grants are currently frozen, further
8 chilling medical innovation, including life-saving clin-
9 ical research.

10 (2) Robert F. Kennedy Jr. shuttered programs
11 and research grant funding dedicated to improving
12 childhood health (including cancelling research of
13 childhood cancer), ended NIH participation in ef-
14 forts to reduce sudden infant death syndrome, and
15 reduced capacity to monitor maternal and infant
16 health.

17 (3) Robert F. Kennedy Jr. shuttered key pre-
18 vention programs and funding streams dedicated to
19 addressing mental health and substance abuse, in-
20 cluding the shuttering of the Substance Abuse and
21 Mental Health Services Administration in violation
22 of Federal law and ending the specialized support
23 services offered by the 988 Suicide and Crisis Life-
24 line for LBQTA+ youth, further compromising the
25 public health of a vulnerable population.

1 (4) Robert F. Kennedy Jr. withheld Congress-
2 sionally authorized funding to carry out the family
3 planning program under title X of the Public Health
4 Service Act (42 U.S.C. 300 et seq.), threatening clo-
5 sure of 865 service sites and cutting access for
6 850,000 patients to essential reproductive and pre-
7 ventive health services, jeopardizing healthcare ac-
8 cess across the United States.

9 (5) Robert F. Kennedy Jr. eliminated various
10 clinical research programs and projects related to
11 prevention and treatment of sexually transmitted in-
12 fections, including human immunodeficiency virus
13 (hereinafter referred to as “HIV”) and the acquired
14 immunodeficiency syndrome (hereinafter referred to
15 as “AIDS”), thus undermining public health, includ-
16 ing for vulnerable populations.

17 (6) Robert F. Kennedy Jr. discontinued the
18 Centers for Research in Emerging Infectious Dis-
19 eases, operated by NIH, jeopardizing public health
20 by deteriorating the scientific understanding and the
21 ability to prevent, detect, and respond to future
22 global pandemics.

23 (7) Robert F. Kennedy Jr. cancelled research
24 grants for vaccines development utilizing mRNA bio-
25 medical technologies despite scientifically studied

1 benefits of such technology, including the COVID-
2 19 vaccine, imperiling the future of biomedical inno-
3 vation for cancer treatment, including for childhood
4 cancer.

5 (8) Robert F. Kennedy Jr. abolished the
6 Foodborne Diseases Active Surveillance Network. As
7 a result of this terminated funding, CDC will only
8 monitor two foodborne illnesses, down from eight
9 which includes the elimination of campylobacter and
10 listeria, which killed 72 people in the United States
11 in 2022.

12 Robert F. Kennedy Jr. has eroded public trust in the
13 effectiveness and safety of vaccines through inflammatory,
14 baseless, and misleading public statements, policies, and
15 other official actions. Such actions also undermine public
16 trust in the entire United States public health system and
17 institutions, thus sowing harmful and unnecessary confu-
18 sion among the American public regarding trusted sources
19 for public health information as follows:

20 (1) Robert F. Kennedy Jr. falsely testified
21 under oath to Congress that he would not take ac-
22 tions that would “make it difficult or discourage
23 people from taking [vaccines]” and that he would
24 not undermine the independence of the Advisory
25 Committee on Immunization Practices (hereinafter

1 referred to as “ACIP”), the premier Federal advisory
2 committee responsible for immunization policy.

3 (2) Robert F. Kennedy Jr. circumvented the
4 independence of the ACIP by firing all 17 members
5 of the ACIP and subsequently appointing unqualified
6 individuals to the ACIP, many of whom hold
7 significant conflicts of interest and have publicly opposed
8 established immunization science. This move
9 represents a scientific coup d’état of immunization
10 science and policy that imperils public health.

11 (3) Robert F. Kennedy Jr. unilaterally fired
12 Susan Monarez, the Senate-confirmed CDC Director.
13 Prior to her firing, Susan Monarez was subject
14 to legally dubious managerial pressure by Robert F.
15 Kennedy Jr. and other politically appointed staff of
16 DHHS to resign over her refusal to implement politically-
17 motivated, scientifically-unfounded policies.
18 Following her firing, Susan Monarez testified under
19 oath in front of the Senate Health, Education,
20 Labor, and Pensions Committee regarding Robert F.
21 Kennedy Jr.’s intention to promote policies, actions,
22 and rhetoric that undermine public health and his
23 failures to execute statutory requirements for his office.
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1 (4) Robert F. Kennedy Jr. unilaterally removed
2 the COVID–19 vaccine from the recommended
3 schedule for pregnant women and children issued by
4 CDC, without the required input from the ACIP. He
5 then falsely testified before the Subcommittee on
6 Health of the Committee on Energy and Commerce
7 of the House of Representatives that he eliminated
8 the recommendation for pregnant women because
9 “there was no science supporting that recommenda-
10 tion”. This change created widespread confusion in
11 vaccine safety, and installed harmful barriers to vac-
12 cine access, including for vulnerable populations.

13 (5) Robert F. Kennedy Jr. appointed David
14 Geier, a known vaccine conspiracy theorist with no
15 medical training, to lead a Federal study into vac-
16 cines, with a focus on the scientifically unsubstan-
17 tiated theory connecting vaccines to autism, further
18 politicizing scientific research and undermining pub-
19 lic trust in immunization safety.

20 (6) Robert F. Kennedy Jr., despite his official
21 capacity as Secretary of Health and Human Serv-
22 ices, has publicly voiced support for baseless, sci-
23 entifically unproven theories regarding immunization
24 safety, including COVID–19 vaccines, and embraced
25 harmful rhetoric wrongfully connecting immuniza-

1 tions to behavioral and health conditions, including
2 during an active measles outbreak.

3 (7) Robert F. Kennedy Jr., despite his official
4 capacity as Secretary of Health and Human Serv-
5 ices, publicly supported Dr. Michael Kirk Moore fol-
6 lowing the dismissal of Federal charges against the
7 physician despite the significant public health harm
8 in doing so. Dr. Moore was accused of destroying
9 COVID–19 vaccines, distributing fake vaccination
10 record cards, and giving children saline shots instead
11 of the vaccine at their parents' request.

12 Robert F. Kennedy Jr. has undermined the public
13 health and safety of the American people through policies
14 relying on unsubstantiated evidence and promoting false,
15 misleading, and dangerous rhetoric. These inflammatory
16 statements and actions contradict established science and
17 Federal policy and further erode public confidence in the
18 Nation's health institutions as follows:

19 (1) Robert F. Kennedy Jr. falsely claimed that
20 acetaminophen usage during pregnancy causes au-
21 tism, a claim that is entirely unsubstantiated, erod-
22 ing public trust in medical advice.

23 (2) Robert F. Kennedy Jr. has made inflam-
24 matory and scientifically unfounded public comments
25 regarding autism, including referring to the condi-

1 tion as “a preventable disease” and made demeaning
2 comments about autistic individuals.

3 (3) Robert F. Kennedy Jr. ordered the CDC to
4 end fluoridation directives in water utilities despite
5 decades of scientific consensus on the proven bene-
6 fits of such directives in preventing tooth decay.

7 (4) Robert F. Kennedy Jr. declared without evi-
8 dence that cell phones cause cancer and neurological
9 harm to children despite such claims having been ex-
10 plicitly refuted by the NIH and other scientific au-
11 thorities.

12 (5) Robert F. Kennedy Jr. falsely claimed that
13 AIDS is caused by the use of alkyl nitrites, a class
14 of recreational drugs colloquially referred to as
15 “poppers”, despites decades of research dem-
16 onstrating the causal relationship between HIV and
17 AIDS.

18 (6) Robert F. Kennedy Jr. falsely claimed that
19 lifestyle changes and vitamin supplements can pre-
20 vent measles, leading to a documented 39% increase
21 in pediatric Vitamin A poisoning cases.

22 In all of this, Robert F. Kennedy Jr. has imperiled
23 the health and safety of the American people, eroded pub-
24 lic confidence in the Nation’s public health institutions,
25 and diminished decades of scientific and medical progress.

1 Wherefore Robert F. Kennedy Jr., by such conduct,
2 warrants impeachment and trial, and removal from office.

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