

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

2019 AUG -6 PM 4: 18

DAVID DELL'AQUILA, on behalf of
himself and all others similarly situated,

Case No. _____

U.S. DISTRICT COURT
MIDDLE DISTRICT OF TN

Plaintiffs,

v.

JURY TRIAL DEMANDED

WAYNE LaPIERRE, the NATIONAL
RIFLE ASSOCIATION OF AMERICA, a
New York not-for-profit corporation, and
the NRA FOUNDATION, INC., a
Washington, D.C. not-for-profit
corporation,

3 - 19 - 0679

Defendants.

CIVIL COMPLAINT

The Plaintiff, David Dell'Aquila, individually and on behalf of himself and all those similarly situated, files this Complaint, by and through counsel, against Wayne LaPierre, the National Rifle Association of America, a New York not-for-profit corporation, and the NRA Foundation, Inc., a Washington, D.C. not-for-profit corporation. In support hereof, the Plaintiff states as follows:

Parties & Jurisdiction

1. The Plaintiff, David Dell'Aquila, is an adult individual residing at 862 Bresslyn Road, Nashville, TN 37205.
2. Defendant, Wayne LaPierre, is the Chief Executive Officer of the National Rifle Association ("LaPierre"). He maintains an office address at National Rifle Association of America, 11250 Waples Mill Road, Fairfax, VA 22030.

3. Defendant, National Rifle Association of America, is a New York not-for-profit corporation (the "NRA"). The NRA has a registered office at c/o Corporation Service Company, 80 State Street, Albany, New York 12207-2543.

4. Defendant, the NRA Foundation, Inc., is a Washington, D.C. not-for-profit corporation (the "NRA Foundation"). The NRA Foundation has a registered office at c/o Corporation Service Company, 1090 Vermont Avenue, N.W., Washington, D.C. 20005.

5. The Plaintiff is asserting jurisdiction in this Court pursuant to 28 U.S.C. § 1332, on grounds of diversity of citizenship between the parties. The amount in controversy is greater than \$75,000.

Background

6. This is a class action lawsuit for fraud in the solicitation of donations by the Defendants Wayne LaPierre, the National Rifle Association of America, and the NRA Foundation, Inc.

7. Plaintiff Dell'Aquila is a longtime donor and supporter of the NRA. Until recently, he had pledged to give seventy-five percent of his estate to the NRA and its subsidiaries, upon his death. Over the last four years, Dell'Aquila has given approximately \$100,000 to the organization in the form of cash donations and gifts in kind. These donations were made to both the NRA and the NRA Foundation.

8. This complaint seeks the certification of two classes of Plaintiffs.

9. The first class is defined as all persons residing in the United States who have donated funds to the NRA from January 1, 2015 to the present (the "NRA Class").

10. The second class is defined as all persons residing in the United States who have donated funds to the NRA Foundation from January 1, 2015 to the present (the "NRA Foundation Class").

11. During such periods of time, Defendants solicited donations from Dell'Aquila and the members of the two Plaintiff Classes. In their solicitations, Defendants alleged that the donations would be used for gun safety education; to promote shooting sports and hunter safety; to foster wildlife conservation; and to protect gun ownership rights in the United States (collectively, the "NRA's core mission").

12. During the past three months, Plaintiff Dell'Aquila has learned that the solicitations that Defendants' made to the Plaintiff Classes concerning the proposed uses of the donated funds were intentionally and materially false.

13. Instead of spending the donated money on the solicited purposes, Defendants used significant portions of the donated funds for purposes unrelated to the NRA's core mission.

14. Plaintiff Dell'Aquila has learned this information from an investigation conducted by the NRA's former President, Lt. Col. Oliver North ("North").

15. North served as President of the NRA from September 2018 through April 2019.

16. After becoming President of the NRA, North learned of possible material financial misconduct by the NRA.

17. First, North learned that the NRA was paying its outside counsel, Texas attorney William Brewer, about \$2 million per month. These expenditures had not been properly authorized by the NRA, or documented by the Brewer law firm. North further learned that the NRA had paid roughly \$20 million to Brewer from April 2018 through March 2019. When North and others requested to see the invoices relating to these extraordinary payments, Defendants LaPierre and the NRA repeatedly denied North access to the information.

18. Second, on April 17, 2019, North learned of allegations in the New Yorker magazine that raised concerns about possible mismanagement of NRA funds. The New Yorker article quoted a former head of the IRS Exempt Organizations division as stating: "The litany of

red flags is just extraordinary,” and “The materials reflect one of the broadest arrays of likely transgressions that I’ve ever seen.”

19. Third, on April 22, 2019, North learned of allegations that, over a period of years, LaPierre had received hundreds of thousands of dollars in clothing, private jet travel, and other personal benefits that were paid for by an NRA vendor. These reimbursements were not included as part of LaPierre's compensation on IRS Form 990, filed by the NRA.

20. North pressed the NRA to investigate the above allegations. North initially raised his concerns through internal-NRA channels, including the NRA’s Audit Committee.

21. On April 18, 2019, North wrote a letter to the General Counsel of the NRA and to the Chairman of the Audit Committee, explaining his concerns with the NRA’s multi-million dollar monthly payments to attorney Brewer. In that letter, North requested that the NRA conduct an outside, independent review of the millions of dollars in payments to Brewer.

22. On April 25, 2019, North wrote another letter -- this time to the Executive Committee of the NRA Board of Directors. In that letter, North stated his intention to form a "Crisis Management Committee," to investigate the allegations of extraordinary spending by the NRA.

23. Each time that North raised concerns about potential financial misconduct and tried to retain professionals to correct any wrongdoing, North’s efforts were thwarted by Defendant LaPierre and the NRA's outside counsel, Brewer. Ultimately, LaPierre managed to shut down North's Crisis Management Committee. As of this date, there has been no independent investigation of the NRA's spending.

24. Meanwhile, LaPierre retaliated against North for attempting to investigate the organization's spending.

25. On April 24, 2019, LaPierre blocked North's re-nomination as President of the NRA, at the national convention for the NRA, held in Indianapolis, Indiana. Ultimately, North was forced out of the office of President.

26. On May 13, 2019, LaPierre sent a letter to North denying him indemnification for any legal issues that might arise, in connection with the growing number of state and federal investigations into the NRA.

27. On June 25, 2019, LaPierre terminated the NRA's agreement with its longtime public-relations agency, Ackerman McQueen.

28. Ackerman McQueen responded to the breach by disclosing information concerning certain financial improprieties raised in this lawsuit.

Class Action Allegations

29. Pursuant to Rules 23(a) and 23(b) of the Federal Rules of Civil Procedure, the Plaintiff brings this action on behalf of himself and two nationwide classes of Plaintiffs.

30. The first class of similarly situated persons is defined as: all persons residing in the United States who have donated funds to the NRA from January 1, 2015 to the present (the "NRA Class").

31. The second class of similarly situated persons is defined as: all persons residing in the United States who have donated funds to the NRA Foundation from January 1, 2015 to the present (the "NRA Foundation Class").

32. Excluded from each nationwide class are the Defendants, their legal representatives, heirs, successors, and assigns of Defendants, and all judges who may ever adjudicate this case.

33. This action is brought as a class action and may be so maintained pursuant to the provisions of Rule 23 of the Federal Rules of Civil Procedure. The Plaintiff reserves the right to modify the two nationwide classes.

34. Numerosity of the Nationwide Classes: Each nationwide Class is so numerous that the individual joinder of all members, in this or any action is impracticable. The exact number of Class members is presently unknown to the Plaintiff; however, it is believed that the NRA Class numbers at least five million persons. The identity of the members of each class and their addresses maybe ascertained from the business records maintained by the NRA and the NRA Foundation. Class members may be informed of the pendency of this action by a combination of e-mail and/or public notice.

35. Commonality: There is a well-defined community of interest in the questions of law and fact involved affecting the members of each Class. These common legal and factual questions for the case involving the NRA Class include:

- a. Whether the Plaintiffs gave money to the NRA with the expectation that such funds would be spent to promote the NRA's core mission.
- b. Whether the NRA misspent such money, on matters unrelated to the NRA's core mission described in Defendants' solicitations.
- c. Whether Defendants LaPierre and the NRA should be liable to repay Plaintiffs the amount of their donations, together with costs and punitive damages.

36. These common legal and factual questions for the case involving the NRA Foundation Class include:

- a. Whether the Plaintiffs gave money to the NRA Foundation with the expectation that such funds would be spent to promote the NRA's core mission.
- b. Whether the NRA Foundation misspent such money, on matters unrelated to the NRA's core mission described in Defendants' solicitations.
- c. Whether Defendants LaPierre and the NRA Foundation should be liable to repay Plaintiffs the amount of their donations, together with costs and punitive damages.

37. Typicality: Plaintiff Dell'Aquila's claims are typical of the claims of the members of the NRA Class and the NRA Foundation Class. Dell'Aquila and each member of the NRA Class has, by definition, given funds to the NRA during the period from January 1, 2015 to the present. Dell'Aquila and each member of the NRA Foundation Class has, by definition, given funds to the NRA Foundation during the period from January 1, 2015 to the present. Plaintiff Dell'Aquila and all members of the each class have suffered similar harm arising from Defendants' violations, as alleged herein.

38. Adequacy: Plaintiff Dell'Aquila is an adequate representative of the NRA Class and the NRA Foundation Class because his interests do not conflict with the interests of the members of the classes he seeks to represent. Plaintiff Dell'Aquila intends to prosecute this action vigorously. Dell'Aquila will fairly and adequately protect the interest of the members of the Class.

39. Predominance and Superiority: This suit may also be maintained as a class action under pursuant to Rule 23(b)(3) of the Federal Rule of Civil Procedure because questions of law and fact common to the Class predominate over the questions affecting only individual members of the Class. A class action is superior to other available means for the fair and efficient adjudication of this dispute. The damages suffered by each individual Class member, depending on the circumstances, may be relatively small or modest, especially given the burden and expense of individual prosecution of the complex and extensive litigation necessitated by Defendants' conduct. Furthermore, it would be virtually impossible for the Class members, on an individual basis, to obtain effective redress for the wrongs done to them. Moreover, even if Class members themselves could afford such individual litigation, the court system could not. Individual litigation presents a potential for inconsistent or contradictory judgments. Individualized litigation increases the delay and expenses to all parties and the court system presented by the complex legal issues of the case. By contrast, the class action device presents far fewer management difficulties and

provides the benefits of a single adjudication, economy of scale, and comprehensive supervision by a single court.

COUNT I

Fraud

Dell'Aquila and NRA Class v. LaPierre and the NRA

40. The Plaintiff incorporates by reference the allegations set forth in the preceding paragraphs as though fully set forth herein.

41. During the period from January 1, 2015 to the present, Defendants LaPierre and the NRA solicited funds from Plaintiff Dell'Aquila and each member of the NRA Class.

42. When soliciting such funds, Defendants LaPierre and the NRA advised Plaintiffs that their funds would be used for gun safety education; to promote shooting sports and hunter safety; to foster wildlife conservation; and to protect gun ownership rights in the United States (collectively, the "NRA's core mission").

43. Plaintiff Dell'Aquila and each member of the NRA Class reasonably relied upon the statements made by Defendants concerning the proposed use of the solicited funds.

44. As a result of such reliance, Plaintiff Dell'Aquila and each member of the NRA Class donated funds to the NRA during the time period from January 1, 2015 to the present.

45. Defendants' statements concerning the use of the solicited funds were materially false. In reality, the NRA used the solicited funds for alternative purposes, including without limitation, the following:

- a. By spending over \$97,000 per day for the legal services of William A. Brewer, III during the first quarter of 2019, without obtaining documentation justifying such expense.

- b. By spending approximately \$2 million per month for the legal services of the Brewer, over a thirteen-month period, without obtaining documentation justifying such expense.
- c. By spending \$274,695 for clothing purchases for Defendant LaPierre from a Beverly Hills clothing store, without reporting such expenses as income for LaPierre in the reports filed by the NRA with the Internal Revenue Service (the "IRS").
- d. By spending \$243,644 on luxury travel for Defendant LaPierre to the Bahamas; Palm Beach; Los Angeles; Reno, Nevada; Budapest, Hungary; and Italy, without reporting such compensation as income for LaPierre in the reports filed by the NRA with the IRS.
- e. By making inflated payments to the NRA's advertising agency, Ackerman McQueen, without obtaining documentation justifying such expense.
- f. By spending \$5,446.16 per month for a luxury apartment for Megan Allen, an intern in Fairfax, Virginia.
- g. By spending funds for a board meeting for the NRA, to be held in Alaska, rather than in Fairfax, Virginia.
- h. By paying Defendant LaPierre an annual salary of \$1.4 million.

46. Plaintiff Dell'Aquila and each member of the NRA Class has incurred damages as a result of the NRA's expenditures, unrelated to its mission.

WHEREFORE, the Plaintiff respectfully requests that this Honorable Court enter an order (a) certifying the NRA Class as a Class of Plaintiffs in this matter pursuant to Rule 23(c) of the Federal Rules of Civil Procedure, and (b) awarding to Dell'Aquila and each member of the NRA Class damages equal to the amounts such persons donated to the NRA during the period from January 1, 2015 to the present, together with costs, punitive damages and attorneys fees.

COUNT II

Fraud

Dell'Aquila and NRA Foundation Class v. LaPierre and the NRA Foundation

47. The Plaintiff incorporates by reference the allegations set forth in the preceding paragraphs as though fully set forth herein.

48. During the period from January 1, 2015 to the present, Defendants LaPierre and the NRA Foundation solicited funds from Plaintiff Dell'Aquila and each member of the NRA Foundation Class.

49. When soliciting such funds, Defendants LaPierre and the NRA Foundation advised Plaintiffs that their funds would be used for gun safety education; to promote shooting sports and hunter safety; to foster wildlife conservation; and to protect gun ownership rights in the United States (collectively, the "NRA's core mission").

50. Plaintiff Dell'Aquila and each member of the NRA Foundation Class reasonably relied upon the statements made by Defendants concerning the proposed use of the solicited funds.

51. As a result of such reliance, Plaintiff Dell'Aquila and each member of the NRA Foundation Class donated funds to the NRA Foundation during the time period from January 1, 2015 to the present.

52. Defendants' statements concerning the use of the solicited funds were materially false. In reality, the NRA Foundation used the solicited funds for alternative purposes, including without limitation, the following:

- a. By transferring approximately \$80 million from the NRA Foundation (a tax-deductible charitable organization) to the NRA (a non-tax-deductible lobbying organization) over a ten-year period. Such funds then became subject to the financial improprieties described in Count I of this Complaint and jeopardized the tax-deductibility of the donations made by Plaintiffs.

- b. By paying \$425,000 *per year* for nine years to the Speedway Children's Charity, a non-profit organization not related to the NRA's core mission.
- c. By paying at least \$125,000 to Youth for Tomorrow, a non-profit organization not related to the NRA's core mission. Defendant LaPierre's wife, Susan LaPierre, served on the board of Youth for Tomorrow, and was its President from 2013 to 2018.

53. Plaintiff Dell'Aquila and each member of the NRA Foundation Class has incurred damages as a result of the NRA's Foundation's expenditures, unrelated to its mission.

WHEREFORE, the Plaintiff respectfully requests that this Honorable Court enter an order (a) certifying the NRA Foundation Class as Class of Plaintiffs in this matter pursuant to Rule 23(c) of the Federal Rules of Civil Procedure, and (b) awarding to Plaintiff Dell'Aquila and each member of the NRA Foundation Class damages equal to the amounts such persons donated to the NRA Foundation during the period from January 1, 2015 to the present, together with costs, punitive damages and attorneys fees.

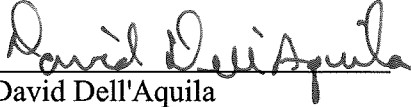
Respectfully submitted,

By: 
David Dell'Aquila

862 Bresslyn Road
Nashville, TN 37205
Phone: (615) 924-4295
E-mail: daquila862@gmail.com

VERIFICATION

I, David Dell'Aquila, hereby swear and affirm that I have read the foregoing Complaint, and that the allegations and facts set forth in the Complaint are true and correct, to the best of my knowledge, information and belief.


David Dell'Aquila

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

<p>I. (a) PLAINTIFFS</p> <p style="font-size: 1.2em; font-family: cursive;">David Dell'Aquila</p> <p>(b) County of Residence of First Listed Plaintiff <u>Davidson Co.</u> <i>(EXCEPT IN U.S. PLAINTIFF CASES)</i></p> <p>(c) Attorneys (Firm Name, Address, and Telephone Number)</p> <p style="font-size: 1.2em; font-family: cursive;">Pro Se 868 Broadway Rd. Nashville, TN 37205</p> <p style="font-size: 1.2em; font-family: cursive;">(615) 924-4295</p>	<p>DEFENDANTS</p> <p style="font-size: 1.2em; font-family: cursive;">Wayne La Pierre et al.</p> <p>County of Residence of First Listed Defendant _____ <i>(IN U.S. PLAINTIFF CASES ONLY)</i></p> <p>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.</p> <p>Attorneys (If Known) _____</p>
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<p>II. BASIS OF JURISDICTION (Place an "X" in One Box Only)</p> <p><input type="checkbox"/> 1 U.S. Government Plaintiff</p> <p><input type="checkbox"/> 2 U.S. Government Defendant</p> <p><input type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)</p> <p><input checked="" type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)</p>	<p>III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; border-right: 1px solid black;"> <p>PTF</p> <p>Citizen of This State <input checked="" type="checkbox"/> 1</p> <p>Citizen of Another State <input type="checkbox"/> 2</p> <p>Citizen or Subject of a Foreign Country <input type="checkbox"/> 3</p> </td> <td style="width: 50%;"> <p>DEF</p> <p>Incorporated or Principal Place of Business in This State <input type="checkbox"/> 1</p> <p>Incorporated and Principal Place of Business in Another State <input checked="" type="checkbox"/> 2</p> <p>Foreign Nation <input type="checkbox"/> 3</p> </td> </tr> <tr> <td style="width: 50%; border-right: 1px solid black;"> <p>PTF</p> <p><input type="checkbox"/> 4</p> <p><input type="checkbox"/> 5</p> <p><input type="checkbox"/> 6</p> </td> <td style="width: 50%;"> <p>DEF</p> <p><input type="checkbox"/> 4</p> <p><input type="checkbox"/> 5</p> <p><input type="checkbox"/> 6</p> </td> </tr> </table>	<p>PTF</p> <p>Citizen of This State <input checked="" type="checkbox"/> 1</p> <p>Citizen of Another State <input type="checkbox"/> 2</p> <p>Citizen or Subject of a Foreign Country <input type="checkbox"/> 3</p>	<p>DEF</p> <p>Incorporated or Principal Place of Business in This State <input type="checkbox"/> 1</p> <p>Incorporated and Principal Place of Business in Another State <input checked="" type="checkbox"/> 2</p> <p>Foreign Nation <input type="checkbox"/> 3</p>	<p>PTF</p> <p><input type="checkbox"/> 4</p> <p><input type="checkbox"/> 5</p> <p><input type="checkbox"/> 6</p>	<p>DEF</p> <p><input type="checkbox"/> 4</p> <p><input type="checkbox"/> 5</p> <p><input type="checkbox"/> 6</p>
<p>PTF</p> <p>Citizen of This State <input checked="" type="checkbox"/> 1</p> <p>Citizen of Another State <input type="checkbox"/> 2</p> <p>Citizen or Subject of a Foreign Country <input type="checkbox"/> 3</p>	<p>DEF</p> <p>Incorporated or Principal Place of Business in This State <input type="checkbox"/> 1</p> <p>Incorporated and Principal Place of Business in Another State <input checked="" type="checkbox"/> 2</p> <p>Foreign Nation <input type="checkbox"/> 3</p>				
<p>PTF</p> <p><input type="checkbox"/> 4</p> <p><input type="checkbox"/> 5</p> <p><input type="checkbox"/> 6</p>	<p>DEF</p> <p><input type="checkbox"/> 4</p> <p><input type="checkbox"/> 5</p> <p><input type="checkbox"/> 6</p>				

IV. NATURE OF SUIT (Place an "X" in One Box Only) Click here for: Nature of Suit Code Descriptions.

<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<p>PERSONAL INJURY</p> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<p>PERSONAL INJURY</p> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <p>PERSONAL PROPERTY</p> <input checked="" type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<p>PERSONAL RIGHTS</p> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<p>Habeas Corpus:</p> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <p>Other:</p> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act	<p>PROTECTOR RIGHTS</p> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <p>LABOR</p> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609

V. ORIGIN (Place an "X" in One Box Only)

1 Original Proceeding 2 Removed from State Court 3 Remanded from Appellate Court 4 Reinstated or Reopened 5 Transferred from Another District (specify) 6 Multidistrict Litigation - Transfer 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 28 USC § 1332

Brief description of cause: Fraud

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. **DEMAND \$** \$10,000,000

CHECK YES only if demanded in complaint: **JURY DEMAND:** Yes No

VIII. RELATED CASE(S) IF ANY (See instructions):

JUDGE _____ DOCKET NUMBER _____

DATE: 8/6/2019 SIGNATURE OF ATTORNEY OF RECORD: David Dell'Aquila

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

Court Name: U. S. District Court, MD/TN
Division: 3
Receipt Number: 34675055872
Cashier ID: althea2
Transaction Date: 08/07/2019
Payer Name: Marita Anne Dellaquila

CIVIL FILING FEE
For: Marita Anne Dellaquila
Amount: \$400.00

CREDIT CARD
Amt Tendered: \$400.00

Total Due: \$400.00
Total Tendered: \$400.00
Change Amt: \$0.00

3:19-cv-0679

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Big-Money Donor Files Class Action Lawsuit Against NRA Over Alleged Misuse of Funds](#)
