

FILED

OCT 26 2017

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

**Clerk, U.S. District & Bankruptcy
Courts for the District of Columbia**

Case No.

GEORGE WEBB SWEIGERT, and)	COMPLAINT - CLASS ACTION
JOHN DOEs 1 to 435,)	
JANE DOEs 1 to 435,)	Case: 1:17-cv-02223 Jury Demand
To Be Named Later,)	Assigned To : Contreras, Rudolph
)	Assign. Date : 10/26/2017
individually, and on behalf of)	Description: Pro Se Gen. Civil (F Deck)
all those similarly situated,)	
)	
Plaintiffs,)	DEMAND FOR JURY TRIAL
vs.)	
Tom Perez, Chairman,)	
DNC SERVICES CORP.)	
d/b/a DEMOCRATIC)	
NATIONAL COMMITTEE)	
430 S. Capitol Street SE, #3)	
Washington, DC 20003)	
and DEBORAH "DEBBIE")	
WASSERMAN SCHULTZ,)	
1114 Longworth Office Building)	
Washington, DC 20515)	
IMRAN AWAN,)	

RECEIVED

OCT 26 2017

**Clerk, U.S. District and
Bankruptcy Courts**

6314 Thomas Drive)
Springfield, VA 22150)
HINA ALVI,)
9574 Linnet Hill Drive)
Lorton, VA 22079)
JAMAL AWAN,)
9574 Linnet Hill Drive)
Lorton, VA 22079)
RAO ABBAS,)
9574 Linnet Hill Drive)
Lorton, VA 22079)
HASEEB RANA,)
7110 Falcon Drive)
Annandale, VA 22003)
Abid Awan,)
7110 Falcon Drive)
Annandale, VA 22003)
NATALIA SOVA,)
7110 Falcon Drive)
Annandale, VA 22003)
THERESA GRAFENSTINE,)
Deloitte, 1919 N. Linn Street,)
Alexandria, VA 22209)

HUMA ABEDIN,)
254 Park Avenue South)
NY, NY 10010)
ANTHONY WEINER,)
254 Park Avenue South)
NY, NY 10010)
Defendants.)

Defendants.)

PLAINTIFFS GEORGE WEBB SWEIGERT and 435 (FOUR HUNDRED THIRTY FIVE) JOHN and JANE DOEs 435 (FOUR HUNDRED THIRTY FIVE) to be named later, (collectively, "Plaintiffs"), individually and on behalf of all those similarly situated, hereby sue Defendants, DNC SERVICES CORPORATION d/b/a DEMOCRATIC NATIONAL COMMITTEE and DEBORAH "DEBBIE" WASSERMAN SCHULTZ (collectively, "Defendants"), and allege the following:

JURISDICTION AND VENUE

1. This Court has original jurisdiction over the claims asserted herein individually and on behalf of the class pursuant to 28 U.S.C. §1332(d), as amended in February 2005 by the Class Action Fairness Act. Alternatively, this Court has original jurisdiction under 28 U.S.C. §1332(a). Subject matter jurisdiction is proper because: (1) the amount in controversy in this class action exceeds five million dollars, exclusive of interest and costs; and (2) a substantial number of the members of the proposed classes are citizens of a state different from that of Defendants. Personal jurisdiction is proper as both Defendants have purposefully availed themselves of the privilege of conducting business activities within this District, and Defendant, Deborah "Debbie" Wasserman Schultz resides in and is a Congresswoman in Washington, DC. Venue is proper in this judicial district under 28 U.S.C. §1391(b)(1) because both Defendants are deemed to reside in this District and under 28 U.S.C. §1391(b)(2) because both Defendants conduct business in this District and a substantial part of the acts or omissions giving rise to the claims set forth herein occurred in this District.

THE PARTIES AND CERTAIN RELEVANT NON-PARTIES

Plaintiffs

2. Plaintiff George Webb Sweigert (“Sweigert”) is a resident of Fort Wayne, Indiana. He contributed a total of \$30 to Bernie Sanders’ presidential campaign via ActBlue. The Plaintiff is also a Registered Democrat in the State of Oregon, and is a Citizen of the United States.

3. Plaintiffs John Does and Jane Does will be named later. One Plaintiff will be chosen from each of the US Congressional Districts in the United States with the requirement of being a Citizen of the United States.

Defendants

4. Defendant, DNC Services Corporation, d/b/a Democratic National Committee (the “DNC”), at all times relevant hereto, was and is a not-for-profit corporation organized under the laws of the District of Columbia and is the operating body of the United States Democratic Party. The DNC maintains its principal place of business at 430 South Capitol Street Southeast in Washington, District of Columbia.

5. Defendant, Deborah “Debbie” Wasserman Schultz (“Wasserman Schultz”) was the Chairperson of the DNC from 2011 to 2016. Wasserman Schultz maintains offices in Pembroke Pines, Florida, and Aventura, Florida, in addition to offices in Washington, D.C.

6. Defendant, Imran Awan ("Imran Awan") has been a key IT employee of Debbie Wasserman Schultz maintains offices in Washington, D.C. and resides in Springfield, VA.

7. Defendant, Abid Awan ("Abid Awan") has been a key IT employee of Debbie Wasserman Schultz maintains offices in Washington, D.C. and resides in Springfield, VA.

8. Defendant, Jamal Awan ("Jamal Awan") has been a key IT employee of Debbie Wasserman Schultz maintains offices in Washington, D.C. and resides in Lorton, VA.

9. Defendant, Rao Abbas ("Rao Abbas") has been a key IT employee of Debbie Wasserman Schultz maintains offices in Washington, D.C. and resides in Lorton, VA.

10. Defendant, Haseeb Rana ("Haseeb Rana") has been a key IT employee of Debbie Wasserman Schultz maintains offices in Washington, D.C. and resides in Springfield, VA.

11. Defendant, Hina Alvi ("Alvi") has been a key IT employee of Debbie Wasserman Schultz maintains offices in Washington, D.C. and resides in Lorton, VA.

12. Defendant, Huma Abedin ("Abedin") has been a key confidant of Debbie Wasserman Schultz maintains offices in Washington, D.C. and resides in New York, New York.

13. Defendant, Anthony Weiner ("Weiner") has been a key confidant of Debbie Wasserman Schultz maintains offices in Washington, D.C. and resides in New York, New York.

Non-Party

14. Non-party ActBlue is a United States political action committee established in June 2004 that enables online fundraising for Democratic Party campaigns. ActBlue charges a 3.95% “processing” fee for each contribution. Some Plaintiffs utilized ActBlue’s online services to make the contributions referred to herein.

GENERAL FACTS

15. The DNC is the formal governing body for the United States Democratic Party. The DNC is responsible for coordinating strategy in support of Democratic Party candidates for local, state, and national office.

16. As part of its duties, the DNC organizes the Democratic National Convention every four years to nominate and confirm a candidate for President, and establishes rules for the state caucuses and primaries that choose delegates to the convention.

17. From 2011 to 2017, Wasserman Schultz was Chairperson of the DNC. Wasserman Schultz has also served as the U.S. Representative for Florida’s 23rd congressional district since 2013; before then, she represented Florida’s 20th district in the U.S. House of Representatives starting in 2005.

18. The DNC is governed by the Charter and Bylaws of the Democratic Party which require financial fidelity and impartiality by law and bylaw.

19. On June 14, 2016, officials of the DNC announced that Russian government hackers had penetrated its computer network. The hackers had access to the network for approximately one year. According to the Washington Post, “[t]he intruders so thoroughly compromised the DNC’s system that they

also were able to read all email and chat traffic” – but in the same article, “[t]he DNC said that no financial, donor or personal information appears to have been accessed or taken[.]”^{6 5} See Tribune news services, “Sanders says he is backing opponent of DNC chair Wasserman Schultz,” Chicago Tribune (May 21, 2016), available at

<http://www.chicagotribune.com/news/nationworld/politics/ct-sanders-dnc-chair-20160521-story.html> (last visited June 20, 2016).⁶ See Ellen Nakashima, “Russian government hackers penetrated DNC, stole opposition research on Trump,” The Washington Post (June 14, 2016)

20. The same day, CrowdStrike – a network security consulting firm retained by the DNC to investigate and respond to the breach – publicly released more details. According to CrowdStrike, two separate hacker groups affiliated with the Russian government, codenamed “Cozy Bear” and “Fancy Bear,” were detected as having infiltrated the DNC network. Both groups have a long history of successfully targeting sensitive government and industry computer networks in both the United States and other countries, often using “sophisticated phishing attacks.” CrowdStrike concluded that Cozy Bear’s intrusion of the DNC network began in summer of 2015, while Fancy Bear separately breached it in April 2016.^{7 134} On June 15, 2016, an individual using the name “Guccifer 2.0” established a publicly accessible website (<https://guccifer2.wordpress.com>) and posted a statement taking credit for the DNC server hack.⁸ Below the statement, Guccifer 2.0 posted a series of documents purportedly taken from the DNC’s servers including: (a) a 281-page confidential “Donald Trump Report” purportedly submitted to the DNC on 12/19/15 and containing extensive research on the

presumptive Republican presidential nominee; (b) Excel spreadsheets containing the names and personal information of donors to the Democratic Party and Hillary Clinton's campaign and a 59-page memorandum marked "Secret" setting forth national security and foreign policy "promises and proposals" and purportedly obtained from Clinton's personal computer.

CLASS ACTION ALLEGATION

19. Plaintiffs bring this lawsuit on behalf of themselves and the proposed class members under Rules 23(b)(1), (b)(2), and (b)(3) of the Federal Rules of Civil Procedure, as noted below.

20. There are four proposed classes (hereinafter collectively referred to as the "Classes"):

a) All people or entities who have contributed to the DNC from January 1, 2015 through the date of this action ("DNC Donor Class");

b) All people or entities who have contributed to the Bernie Sanders campaign from January 1, 2015 through the date of this action ("Sanders Donor Class"); and

c) All registered members of the Democratic Party ("Democratic Party Class"), and

d) Citizens of the United States ("Citizens").

21. Plaintiffs, George Webb Sweigert, and John and Jane Does to be named later, bring this action on behalf of themselves and the DNC Donor Class. Hereinafter, they will be referred to collectively as the "DNC Donor Class Plaintiffs."

22. Plaintiffs, George Webb Sweigert, and John and Jane Does to be named later, bring this action on behalf of themselves and the Sanders Donor Class. Hereinafter, they will be referred to collectively as the “Sanders Donor Class Plaintiffs.”

23. All registered members of the Democratic Party (“Democratic Party Class”).

24. All citizens of the United States. (“Citizens”).

25. Numerosity. The members of each of the Classes are so numerous that their individual joinder is impracticable.

26. Existence and Predominance of Common Questions of Law and Fact. Common questions of law and fact exist as to all members of the Classes and predominate over any questions affecting only individual members of the Classes.

27. Typicality. Plaintiffs’ claims are typical of the claims of the members of the Classes they seek to represent, and Plaintiffs have the same claims as those of the other class members they seek to represent.

28. Adequacy of Representation. Plaintiffs will fairly and adequately protect the interests of the members of their respective Classes. Plaintiffs will retain counsel highly experienced in class action litigation, and Plaintiffs intend to prosecute this action vigorously. Plaintiffs have no adverse or antagonistic interests to those of the Classes.

29. The prosecution of separate actions by individual members of the Classes would create a risk of inconsistent or varying adjudications with respect

to individual members of the Classes which would establish incompatible standards of conduct for the parties opposing the Classes.

30. Defendants acted on grounds generally applicable to the Classes with respect to the matters complained of herein, thereby making appropriate the relief sought herein with respect to each of the Classes as a whole.

CAUSES OF ACTION

COUNT I

(Fraud)

(DNC Donor Class & Sanders Donor Class)

31. The DNC Donor Class Plaintiffs and the Sanders Donor Class Plaintiffs re-allege paragraphs 1 through 30 above as if fully set forth herein.

32. Defendants (sans Grafenstine) hacked the DNC servers, copying critical informations such as names, email address, home addresses, and phone numbers of the entire donor and volunteer database known as NGP/VAN. Other critical reports such as reports based on Microsoft Word and Microsoft Excel were also taken.

33. Defendants (sans Grafenstine) engineered a sophisticated email phishing attack against Bernie Sanders supporters nationwide using a scheme that substitute a similar URL for the donation processing company ActBlue. The ActBlue URL was changed by one letter from www.actblue.com to www.actblues.com, routing donations intended for Bernie Sanders to bank accounts controlled by Debbie Wasserman-Schultz and/or Imran Awan.

34. Defendants (sans Grafenstine) also engineered a sophisticated email phishing attack against Progressive (so called BernieCrats) candidate supporters

nationwide using a scheme that substitute a similar URL for the donation processing company ActBlue. The ActBlue URL was changed by one letter from www.actblues.com to www.actblues.com, routing donations intended for Progressive candidates to bank accounts controlled by Debbie Wasserman-Schultz and/or Imran Awan.

35. Defendants (sans Grafenstine) concocted a false narrative that the Russian government had been responsible for the hacking and phishing attacks.

37. Defendants (sans Grafenstine) intended that the false statements and omissions would induce the DNC Donor Class Plaintiffs, the Sanders Donor Class Plaintiffs, and members of the DNC Donor Class and the Sanders Donor Class, to rely on them for continuing contributions and these conspiratorial attacks.

34. The DNC Donor Class Plaintiffs, the Sanders Donor Class Plaintiffs, and members of the DNC Donor Class and the Sanders Donor Class, relied on Defendants' false statements and omissions to their injury.

35. Defendants' conduct (sans Grafenstine) was intentional, willful, wanton, and malicious. Defendants had actual knowledge of the wrongfulness of the conduct and the high probability that injury to the DNC Donor Class Plaintiffs, the Sanders Donor Class Plaintiffs, and members of the DNC Donor Class and the Sanders Donor Class would result and, despite that knowledge, intentionally pursued that course of conduct, resulting in injury.

36. Defendants' conduct (sans Grafenstine) was so reckless or wanting in care that it constituted a conscious disregard or indifference to the rights of the

DNC Donor Class Plaintiffs, the Sanders Donor Class Plaintiffs, and members of the DNC Donor Class and the Sanders Donor Class.

CAUSES OF ACTION

COUNT II

(Breach of Fiduciary Duty)

(Democratic Party Class and Citizens Class)

37. The Democratic Party Class Plaintiffs re-allege paragraphs 1 through 36 above as if fully set forth herein.

38. Defendants had a fiduciary duty to the Democratic Party Class Plaintiffs, to the Citizens Class Plaintiffs, members of the Democratic Party Class, and to the Citizens Class.

39. Defendants breached their fiduciary duty to the Democratic Party Class Plaintiffs and Citizens Class Plaintiff, and members of the Democratic Party Class and the Citizens Class.

40. The Democratic Party Class Plaintiffs, the Citizens Class Plaintiffs, members of the Democratic Party Class, and members of the Citizens Class have been proximately damaged by Defendants' breach.

41. Defendants' conduct was intentional, willful, wanton, and malicious. Defendants had actual knowledge of the wrongfulness of the conduct and the high probability that injury to the Democratic Party Class Plaintiffs and Citizens Class Plaintiffs, members of the Democratic Party Class, and members of the Citizens Class would result and, despite that knowledge, intentionally pursued that course of conduct, resulting in injury.

42. Beyond the criminal hacking and phishing attacks at the DNC, upon information and belief, we allege the Defendants have hacked key Congressional communication systems such as iConstituent and InterAmerica constituent management systems. By these acts, Debbie Wasserman-Schultz, Imran Awan, Abid Awan, Hina Alvi, Rao Abbas, Haseeb Rana, Jamal Awan, and Omar Awan created and **continue** and a criminal conspiracy, a spy ring in the US House of Representatives which subverted, **and continue to subvert**, the fundamental processes of democracy guaranteed in the United States Constitution including free speech and debate between constituents and Members of the House of Representative and free and fair elections of those individuals.

43. The Defendants conspiracy directly impinges upon every member of the Citizen Class' fundamental rights of free speech with their elected Representatives and the expectation of fair and free elections. the entire democratic process has been subverted, essentially nullifying the Constitution and the purpose of the US House of Representatives.

44. Under Racketeering law here in the US, the Plaintiffs hereby request for RICO any **referral letter** or **investigative documents** handed off to or from the FBI to or from the Inspector General of House of Representatives, Theresa Grafenstine, the House Committee on Administration, and the Chief Administrative Officer of the House of Representatives.

45. Upon information and belief, the Defendants used an illegal email/dropbox combination in the House of Representatives at the 123@mail.house.gov email address. Upon information and belief, we believe an illegal Dropbox account was used to share information with representative of

foreign governments including Pakistan and the UAE for the purpose of economic espionage and influence peddling. Indeed, the Defendant Debbie Wasserman-Shultz has publicly admitted in the press to the use of such a Dropbox account against House rules.

46. Upon information and belief, Debbie Wasserman-Schultz, Anthony Weiner, and Huma Abedin compounded the irreparable harm to the legislative processes by engaging in a pay to play scheme, moving privileged, private communication from iConstituent Congressional servers located in the US House of Representatives and DNC servers containing NGP/VAN information to Anthony Weiner's laptop device in New York City on or about during the period of February 2016 to October 2016. Any additional illegal transfers of data from servers in the US House of Representatives occurring between February 2016 and October 2016 will be clarified after receiving the House Inspector General's report and FBI suspicious activity reports. These acts of transferring electronic records from Congress to Weiner and Abedin are felonies in terms of eavesdropping, illegal wiretap, and mishandling of classified information. Upon information and belief, Member of Congress with special Blackberry phones synced to laptops strategically placed around the main Congressional office buildings of Rayburn, Longworth, Cannon, and Library of Congress. These laptops were configure in turn to sync to a private, illegal, Blackberry Enterprise Server on the Capitol grounds which in turn synced with Anthony Weiner laptop in New York. Imran Awan subverted stated rules in the US House of Representatives to properly receive all communications devices intended for use

by Member of Congress to the offices of the Chief Administrative Offices of the House of Representative.

47. Mr. Awan illegally received deliveries of iPhone and iPads intended for use by Members of Congress to his home at 9667 Hawkshead Drive, Lorton, Virginia from government reseller CDW-G in February of 2016. Upon information and belief, these phones were then illegally sent to Pakistan, and then returned to the United States, Upon information and belief, we believe this was a regular practice of the Defendants. Mishandling phones and laptops intended for Congressional Members is a felony and a clear violation of the Computer Fraud and Abuse Act (CFAA).

48. Imran Awan and Omar Awan entered into a conspiracy to create fake employees in the House of Representatives Human Resource system called PeopleSoft. Illegal administrative rights were created for Imran Awan in this system, and a scheme was used to reuse personnel records of retired employees of the US House of Representatives for fraudulent loans from the US Congressional Federal Credit Union.

49. Imran Awan and Hina Alvi engaged in a scheme to send fraudulent payments from fake employee accounts in the US House of Representatives from the US Congressional Federal Credit Union to Faisalabad, Pakistan. The Federal Bureau of Investigations has compiled evidence of hundreds of these illegal transfers, and we will move to bring these reports to the eyes of the Court. We believe a corresponding internal report exists in the US House Committee on Administration that we will move to bring to the eyes of the Court. These acts are felonies and constitute Wire Fraud and Racketeering (RICO) Statutes.

50. Imran Awan, Hina Alva, and Rao Abbas did engage in espionage against the people of the United States of America by taking electronic devices such as thumb drives, hard drives, and laptops with trade secrets and General Services Administrative bidding information to Pakistan for disclosure and sales to business entities in Pakistan. These acts are felonies under the Espionage Act of 1917.

51. The Inspector General of the House of Representative, Theresa Grafenstine, has known of these frauds for at least eighteen months, and has not moved to protect the legislative and election processes in the US House of Representatives through publication of these misdeeds, and Mrs. Grafenstine thereby has been negligent in her duties.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for a judgment:

52. The Plaintiffs seek the equity powers of the Courts to immediately enjoin this active spy ring in the US House of Representative by revoking network privileges and administrator's rights of Rao Abbas who is still employed in the US House of Representative, and immediate production and publication of all documents related to the investigations of the Awan spy ring named above including FBI Suspicious Activity Reports, all House Committee Administration reports, all House Congressional Federal Credit Union reports, and all House Inspector General reports related to the Defendants misdeeds so that United States might begin to assess the irreparable harm done to the Country.

53. For declaratory and injunctive relief declaring illegal and enjoining, preliminarily and permanently, Defendants' violation of and failure to follow the Charter and Bylaws of the Democratic Party;

54. Certification of this action as a class action, designation of Plaintiffs as class representatives and undersigned counsel as class counsel;

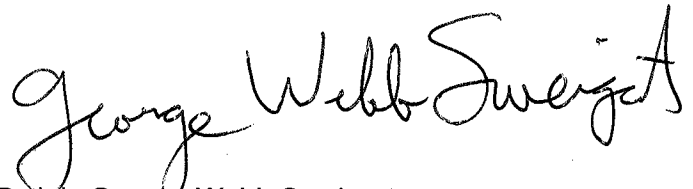
55. For compensatory, general, restitutionary, restorative, statutory, treble, and special damages for Plaintiffs against Defendants;

56. Exemplary/punitive damages as against Defendants in an amount sufficient to deter and to make an example of Defendants; Prejudgment and post-judgment interest; and

57. The cost of this suit and such other relief as the court finds just and proper. JURY DEMAND

58. Plaintiffs demand a jury trial on all issues so triable.

DATED: October 26th, 2017



RESPECTFULLY SUBMITTED, /s/ George Webb Sweigert

By: George Webb Sweigert

3312 Ralston Drive

Fort Wayne, IN 46805

503-919-0748

georg.webb@gmail.com

Memorandum Attached, Exhibits A, B

MEMORANDUM

I, George Webb Sweigert, being duly sworn, depose and state:

INTRODUCTION

As a citizen journalist, I have personally participated in this investigation by personally visiting most the homes and businesses of the defendants, and interviewing many of the occupants. I have made a videotape record of most of these interactions. Also, I have researched business relationships and online news articles about the defendants over the last 150 days, sharing the results daily on YouTube with over 40,000 subscribers in a crowd sourced investigation.

The findings from this investigation have uncovered misuse of government resources, illegal access to classified information, fraudulent borrowing, and the possible use of a car dealership to launder money for operations for terrorists organizations such as Hezbollah.

In my experience as a journalist, I believe the Prosecution to be obstructing justice in this case, and I call for the Court to allow me to stand in the shoes of the Prosecution. The Prosecution has suppressed Imran Awan's involvement in an investigation into Rep. Yvette Clarke's office for the malfeasance of \$120,000 by shipping iPhones and iPads to the private residence of Mr. Awan. The Prosecution has suppressed Mr. Awan and Mrs. Alvi's involvement of US Congressional Credit Union loan activity with the possible undue influence of Debbie Wasserman Schultz. The Prosecution has suppressed the publication of mug shots for Mr. Awan and Mrs. Alvi as well, fully knowing Imran Awan used false names in his real estate dealings. The suppression of these mug shots crippled the ability of other victims to come forward in this period before arraignment. The Prosecution has suppressed the multiple visas and travel records of Mr. Awan. A responsible Prosecution would have published TSA travel photos and dates to help other victims of fraud to come forward.

BACKGROUND

In this process, I have identified numerous documents that might be help to shed light on the totality of the State's case against Imran Awan and Hina Alvi. All of these documents are available at the fingertips of the Prosecution, and the Prosecution should be compelled to publish them.

SOURCE OF INFORMATION

1. A Congressional investigative report exists implicating Imran Awan and conspirators in twenty burglaries of House of Representative Members offices and committee rooms. this report was prepared by James Kaelin, CIO of the Sergeant of Arms of the House of Representatives and Board Chairman on the Congressional Federal Credit Union.

2. A Congressional Auditor's report from interviews conducted in September of 2016 of Abid Awan (Defendant's brother) and possibly Imran Awan outlining an extraordinary purchase and shipment of 150 iPhones and iPads to the 9667 Hawkshead Drive, Lorton, VA home of Imran Awan in February 2016 from the budget of Yvette Clark, the House Representative of the 9th District of New York.
3. On April 10th, 2017, I conducted a personal interview of the US Marine Andre Taggart who was renting the 9667 Hawkshead Drive home with his wife after Imran had moved out. I believe Mr. Taggart would be an excellent witness for the State given the fact he rented the Hawkshead Drive directly from the Defendant's Imran Awan and Hina Alvi. He reported to me that Mr. Awan gave him a false name in this transaction. A videotape deposition from Andre Taggart is available now from an interview two days ago and can be produced for the Court.
4. Additionally, an early January police report was filed after Samina Gilani, the stepmother of Imran Awan and his brother Abid Awan, called the police for imprisoning her against her will, tapping her cell phone, forcing her to turn over her inheritance to them, and finally enforced by making threats to kidnap members of the stepmother's family in Pakistan. A life insurance case against Imran Awan was also filed by Ms. Gilani's attorney, and the proceedings of that matter are available to this Court.
5. I also have reason to believe the Capitol Police have a report in the matter of receiving the government property from the Hawkshead home that could shed light on the charge of mishandling classified information from key Congressional committees. The videotape interview which attests to these facts has been made by Andre Taggart, the Marine who rented this home from Imran Awan and Hina Alvi, is available to this Court.
6. An equipment list from the TSA search of Hina Alvi's belongings conducted at the Dulles Airport in early March 5th, 2017 when she exited the United States to Pakistan exists and could provide critical information to the court.
7. Additional purchasing documents exist from CDW and other IT equipment resellers that other deliveries were made to the Hawkshead Drive Awan home, and these purchasing documents and the deliveries to other Imran Awan properties could help inform the court as well.

FACTS SUPPORTING PROBABLE CAUSE

1) I was informed by Mr. Taggart that he had called the FBI about "a pile of Blackberries", three or four laptops, pried hard drives, and a printer router with government markings he found after Imran had already been banned from the Congressional computer network. NCIS (US Navy Investigative Services) became involved in the investigation because Andre Taggart's wife, Vernaye Taggart, is a Chief Petty Officer in the US Navy. After she was cleared of any wrongdoing, the equipment was finally seized by Capitol Hill Police. A videotape deposition of these facts now exists, and can be made available to the Court.

2) The Daily Caller has reported Imran Awan used unvetted intermediaries to delivery "secure" Blackberry phones to Members of Congress will become readily apparent including Rao Abbas and Haseeb Rana.

3) Upon discovery of these documents, I believe the relationship of Suraiya Begum, Hina Alvi's mother, and the company she formed with Imran Awan, Nanoset Technologies, will come to light. I believe Hina Alvi's mother to be a top satellite scientist for the country of Bangladesh. Hina Alvi's relationship with the company SUPARCO, a satellite data provider with their relationship to Middle Eastern nations' oil and defense applications, should be explored, I believe the Pakistan Intelligence Service (ISI) has engaged the US to resell key satellite technology through US corporations for the NADRA surveillance systems. Leaking these key satellite secrets regarding Nanoset design and deployment for the benefit of private corporations should be explored.

4) Upon inspection, I believe Imran Awan's use of a private Blackberry Enterprise Server to store all the email and documents of the Members of Congress Imran worked for at his Lorton, VA home will become readily apparent, All documents relating to IP addresses and procurements for the collection system at the Hawkshead Drive home of Imran Awan should be explored.

CONCLUSION I believe Mr. Andre Taggart could be an excellent witness for the State establish the facts in the case for both Bank Fraud and the Distributing of Classified Information.

I believe Congressional Reports, Capitol Police Reports, and CDW-G purchase and shipment records could shed like on the totality of the fraud perpetrated by Imran Awan and Hina Alvi. Additionally, an investigation of email traffic for the multiple email addresses for Mr. Awan's and Ms. Alvi to Pakistan should yield that proof and classified information was mishandled.

REQUEST FOR PROSECUTION Cite Laws broken

18 U.S. Code § 798 - Disclosure of classified information

(a)Whoever knowingly and willfully communicates, furnishes, transmits, or otherwise makes available to an unauthorized person, or publishes, or uses in any manner prejudicial to the safety or interest of the United States or for the benefit of any foreign government to the detriment of the United States any classified information—

(1) concerning the nature, preparation, or use of any code, cipher, or cryptographic system of the United States or any foreign government; or

(2) concerning the design, construction, use, maintenance, or repair of any device, apparatus, or appliance used or prepared or planned for use by the United States or any foreign government for cryptographic or communication intelligence purposes; or

(3) concerning the communication intelligence activities of the United States or any foreign government; or

(4) obtained by the processes of communication intelligence from the communications of any foreign government, knowing the same to have been obtained by such processes—

Shall be fined under this title or imprisoned not more than ten years, or both.

(b) As used in subsection (a) of this section—

The term “classified information” means information which, at the time of a violation of this section, is, for reasons of national security, specifically designated by a United States Government Agency for limited or restricted dissemination or distribution;

The terms “code,” “cipher,” and “cryptographic system” include in their meanings, in addition to their usual meanings, any method of secret writing and any mechanical or electrical device or method used for the purpose of disguising or concealing the contents, significance, or meanings of communications;

The term “foreign government” includes in its meaning any person or persons acting or purporting to act for or on behalf of any faction, party, department, agency, bureau, or military force of or within a foreign country, or for or on behalf of any government or any person or

persons purporting to act as a government within a foreign country, whether or not such government is recognized by the United States;

The term “communication intelligence” means all procedures and methods used in the interception of communications and the obtaining of information from such communications by other than the intended recipients;

The term “unauthorized person” means any person who, or agency which, is not authorized to receive information of the categories set forth in subsection (a) of this section, by the President, or by the head of a department or agency of the United States Government which is expressly designated by the President to engage in communication intelligence activities for the United States.

(c) Nothing in this section shall prohibit the furnishing, upon lawful demand, of information to any regularly constituted committee of the Senate or House of Representatives of the United States of America, or joint committee thereof.

(d) (1) Any person convicted of a violation of this section shall forfeit to the United States irrespective of any provision of State law—

(A) any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violation; and

(B) any of the person’s property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation.

(2) The court, in imposing sentence on a defendant for a conviction of a violation of this section, shall order that the defendant forfeit to the United States all property described in paragraph (1).

(3) Except as provided in paragraph (4), the provisions of subsections (b), (c), and (e) through (p) of section 413 of the Comprehensive Drug Abuse Prevention and Control Act of 1970 (21 U.S.C. 853(b), (c), and (e)–(p)), shall apply to—

- (A) property subject to forfeiture under this subsection;
 - (B) any seizure or disposition of such property; and
 - (C) any administrative or judicial proceeding in relation to such property,
- if not inconsistent with this subsection.

(4) Notwithstanding section 524(c) of title 28, there shall be deposited in the Crime Victims Fund established under section 1402 of the Victims of Crime Act of 1984 (42 U.S.C. 10601) all amounts from the forfeiture of property under this subsection remaining after the payment of expenses for forfeiture and sale authorized by law.

(5) As used in this subsection, the term “State” means any State of the United States, the District of Columbia, the Commonwealth of Puerto Rico, and any territory or possession of the United States.

(Added Oct. 31, 1951, ch. 655, § 24(a), 65 Stat. 719; amended Pub. L. 103–322, title XXXIII, § 330016(1)(L), Sept. 13, 1994, 108 Stat. 2147; Pub. L. 103–359, title VIII, § 804(a), Oct. 14, 1994, 108 Stat. 3439; Pub. L. 104–294, title VI, § 602(c), Oct. 11, 1996, 110 Stat. 3503.)

EXHIBITS OF THIS MOTION ARE IN THE ORIGINAL

EXHIBITS A Through 

To Plaintiffs-Interveners Motion to Intervene

EXHIBIT ~~A~~
GRASSLEY LETTER TO DHS

CHARLES E. GRASSLEY, IOWA, CHAIRMAN

ORRIN G. HATCH, UTAH
LINDSEY O. GRAHAM, SOUTH CAROLINA
JOHN CORNYN, TEXAS
MICHAEL S. LEE, UTAH
TED CRUZ, TEXAS
BEN SASSE, NEBRASKA
JEFF FLAKE, ARIZONA
MIKE CRAPO, IDAHO
THOM TILUS, NORTH CAROLINA
JOHN KENNEDY, LOUISIANA

DIANNE FEINSTEIN, CALIFORNIA
PATRICK J. LEAHY, VERMONT
RICHARD J. DURBIN, ILLINOIS
SHELDON WHITEHOUSE, RHODE ISLAND
AMY KLOBUCHAR, MINNESOTA
AL FRANKEN, MINNESOTA
CHRISTOPHER A. COONS, DELAWARE
RICHARD BLUMENTHAL, CONNECTICUT
MAZIE HIRONO, HAWAII

United States Senate

COMMITTEE ON THE JUDICIARY

WASHINGTON, DC 20510-6275

KOLAN L. DAVIS, *Chief Counsel and Staff Director*
JENNIFER DUCK, *Democratic Staff Director*

August 04, 2017

VIA ELECTRONIC TRANSMISSION

Elaine Duke
Acting Secretary
U.S. Department of Homeland Security
Washington, D.C. 20528

Dear Acting Secretary Duke:

The Federal Bureau of Investigation (FBI), Customs and Border Protection (CBP), and the U.S. Capitol Police recently arrested Imran Awan, a congressional I.T. specialist for several members of the U.S. House of Representatives, as he was trying to leave the country for his native Pakistan.¹ According to an FBI affidavit, Awan was arrested for allegedly engaging in a bank fraud scheme by obtaining a home equity line of credit based on material misrepresentations.² News reports state that Awan wired \$300,000 of the proceeds from the fraudulent activity to Pakistan.³ In attempting the wire transfer, Awan pretended to be his wife, lied that the transfer was for “funeral arrangements,” and then told the bank manager to hold while he googled a reason for the transfer.⁴ Reportedly, there were other wire transfers to Pakistan in addition to the \$300,000.⁵

Awan began working as an I.T. aide in 2004.⁶ Later, his wife, two brothers, and two friends began working as I.T. aides for nearly 30 congressmen.⁷ Over the span of 13 years, they

¹ Chad Pergram and Jake Gibson, *Feds Arrest IT Staffer for Wasserman Schultz Trying to Leave Country* (July 25, 2017), available at <http://www.foxnews.com/politics/2017/07/25/feds-arrest-it-staffer-for-wasserman-schultz-trying-to-leave-country.html>

² FBI Affidavit. Available at <https://www.documentcloud.org/documents/3900669-Awan-Imran-Complaint-and-Affidavit.html>

³ Eli Watkins, *Democratic staffer arrested on bank fraud charge*, CNN (July 27, 2017); Luke Rosiak, *Wasserman Schultz Aide in Pakistan Still Liquidating Assets in US*, Daily Caller (July 30, 2017).

⁴ Luke Rosiak, *Wasserman Schultz Aide in Pakistan Still Liquidating Assets in US*, Daily Caller (July 30, 2017).

⁵ *Id.*

⁶ Luke Rosiak, *Pakistani Suspects In House IT Probe Received \$4 Million From Dem Reps*, Daily Caller (March 1, 2017)

⁷ Luke Rosiak, *Pakistani Suspects In House IT Probe Received \$4 Million From Dem Reps*, Daily Caller (March 1, 2017); Nicholas Fandos, *Trump Fuels Intrigue Surrounding a Former I.T. Worker's Arrest*, The New York Times (July 28, 2017).

Acting Secretary Duke
August 4, 2017
Page 2 of 3

collected more than \$4 million—a sum that is reported to be three times higher than the norm for a government contractor.⁸

In light of the alleged illegal activity, the Committee seeks to better understand Awan and his associates' immigration histories. Therefore, please provide the Alien File for the individuals listed below. Please also include any temporary files, working files, and all documents and items contained in them that were generated by DHS or in its possession about each individual listed below, whether currently in written or electronic form, including criminal history and immigration summaries, detainers, or requests for notification, if applicable.

- Imran Awan
- Hina Alvi
- Abid Awan
- Natalia Sova
- Jamal Awan
- Rao Abbas

I anticipate that your written response and the responsive documents will be unclassified. Please send all unclassified material directly to the Committee. In keeping with the requirements of Executive Order 13526, if any of the responsive documents do contain classified information, please segregate all unclassified material within the classified documents, provide all unclassified information directly to the Committee, and provide a classified addendum to the Office of Senate Security. The Committee complies with all laws and regulations governing the handling of classified information. The Committee is not bound, absent its prior agreement, by any handling restrictions or instructions on unclassified information unilaterally asserted by the Executive Branch.

Thank you for your attention to this matter. Please respond by August 18, 2017. If you have any questions, please contact Katherine Nikas and Josh Flynn-Brown of my Committee staff at (202) 224-5225.

⁸ Tyler O'Neil, *Imran Awan Scandal Shows Just How Much Dirt Dems Wanted to Hide By Focusing on Trump-Russia*, PJ Media (July 27, 2017).

Acting Secretary Duke
August 4, 2017
Page 3 of 3

Sincerely,

A handwritten signature in black ink that reads "Chuck Grassley". The signature is written in a cursive, slightly slanted style.

Charles E. Grassley
Chairman
Senate Committee on the Judiciary

Cc:

The Honorable Dianne Feinstein
Ranking Member
Senate Committee on the Judiciary

EXHIBIT B

🐦 (<http://www.twitter.com/dailycaller>) **f** (<http://www.facebook.com/DailyCaller>)
8+ (<https://plus.google.com/104273926598894453484/posts>) **in**
(<https://www.linkedin.com/company/the-daily-caller>)

SENATOR GRASSLEY CALLS
FOR IMMIGRATION INQUIRY
INTO IMRAN AWAN



INVESTIGATIVE GROUP

**THE DAILY CALLER
NEWS FOUNDATION**
(<http://dailycallernewsfoundation.org/>)



Grassley Seeks Immigration Files For Pakistani Suspects In House IT Probe



MARK TAPSCOTT



tapscott/)

Executive Editor, Chief of Investigative Group

(http://dailycaller.com/author/mark-

tapscott/)



2697



625



Senate Judiciary Committee Chairman Chuck Grassley has requested copies of immigration files for the six Pakistani suspects in the House IT scandal, who allegedly stole equipment from Congress and accessed computers without permission.

Grassley is seeking more information on Imran Awan, his wife, his two brothers and two of his close friends in connection to the scandal. Capitol police have accused Awan and his associates of violating congressional security policies and stealing equipment from Congress. Awan is from Pakistan, and was arrested by the FBI in July as he boarded a flight to the country.

"In light of the alleged illegal activity, the committee seeks to better understand Awan and his associates' immigration histories," Grassley said in an August 4 letter ([https://www.judiciary.senate.gov/imo/media/doc/2017-08-04%20CEG%20to%20DHS%20\(Awan%20et%20al%20A%20Files\)%20.pdf](https://www.judiciary.senate.gov/imo/media/doc/2017-08-04%20CEG%20to%20DHS%20(Awan%20et%20al%20A%20Files)%20.pdf)) to Acting Secretary of the Department of Homeland Security Elaine Duke. The letter was made public by the committee Monday.

"Therefore, please provide the Alien File for the individuals listed below," he continued. "Please also include any temporary files, working files, and all documents and items contained in them that were generated by DHS or in its possession."

The Iowa Republican was first elected to the Senate in 1981.

Besides Awan, the immigration files were requested for his wife, Hina Alvi, his brothers Abid and Jamal, sister-in-law Natalia Sova and friend Rao Rabbas. All are suspects in the criminal investigation, which became public in February (<http://dailycaller.com/2017/02/04/exclusive-house-intelligence-it-staffers-fired-in-computer-security-probe/>).

“Awan began working as an IT aide in 2004,” Grassley said in the letter. “Later, his wife, two brothers, and two friends began working as IT aides for nearly 30 congressmen. Over the span of 13 years, they collected more than \$4 million— a sum that is reported to be three times higher than the norm for a government contractor.”

All of the congressmen involved are House Democrats, including several on the intelligence, foreign affairs and homeland security committees. The IT aides had access to all of the emails (<http://dailycaller.com/2017/03/13/house-hacking-suspects-could-read-every-email-dozens-of-congressmen-sent-and-received/>) and office files of the congressmen, who employed them on a shared basis.

The employment of all of the suspects was terminated in February, except Awan’s wife, who was retained by Democratic Rep. Wasserman Schultz until March. Wasserman Schultz — the Florida Democrat who was Democratic National Committee Chairman until July 2016 — kept Awan on her payroll (<http://dailycaller.com/2017/07/29/wasserman-schultz-seemingly-planned-to-pay-suspect-even-while-he-lived-in-pakistan/>) until July 25.

Awan was arrested (<http://dailycaller.com/2017/07/25/wasserman-schultzs-it-aide-arrested-trying-to-flee-the-country/>) July 24 at Dulles International Airport by the FBI, U.S. Capitol Police and U.S. Customs and Border Protection before he could board the flight to Pakistan. His wife returned to Pakistan in March, along with their three children.

Authorities charged Awan with bank fraud in connection with a \$165,000 mortgage loan from the Wright Patman Congressional Federal Credit Union. Awan wire transferred \$283,000 to Pakistan prior to his attempt to flee the country, according to a court document (<https://www.documentcloud.org/documents/3900669-Awan-Imran-Complaint-and-Affidavit.html>) filed by the FBI.

Within hours of his arrest, Imran Awan retained Chris Gowen as his defense attorney. Gowen is a long-time associate (<http://dailycaller.com/2017/07/26/imran-awans-lawyer-is-long-time-clinton-associate/>) of former President Bill Clinton and former Secretary of State Hillary Clinton.

Follow Mark on Twitter (<https://twitter.com/mtapscott>)

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CIVIL COVER SHEET

JS-14 (Rev. 7/16 DC)

<p>I. (a) PLAINTIFFS GEORGE WEBB SUEIGERT</p> <p>(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF <u>88888</u> (EXCEPT IN U.S. PLAINTIFF CASES)</p> <p>(c) ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER) PRO SE 3312 RALSTON DRIVE FORT WAYNE, IN 46805</p>	<p>DEFENDANTS DEMOCRATIC NATIONAL COMMITTEE TOM PEREZ</p> <p>COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT</p> <p>Case: 1:17-cv-02223 Jury Demand Assigned To : Contreras, Rudolph Assign. Date : 10/26/2017 Description: Pro Se Gen. Civil (F Deck)</p>																								
<p>II. BASIS OF JURISDICTION (PLACE AN X IN ONE BOX ONLY)</p> <p><input checked="" type="radio"/> 1 U.S. Government Plaintiff <input type="radio"/> 3 Federal Question (U.S. Government Not a Party)</p> <p><input checked="" type="radio"/> 2 U.S. Government Defendant <input type="radio"/> 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) <u>FOR DIVERSITY CASES ONLY!</u></p> <table style="width:100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th style="text-align: center;">PTF</th> <th style="text-align: center;">DFT</th> <th></th> <th style="text-align: center;">PTF</th> <th style="text-align: center;">DFT</th> </tr> </thead> <tbody> <tr> <td>Citizen of this State</td> <td style="text-align: center;"><input type="radio"/> 1</td> <td style="text-align: center;"><input type="radio"/> 1</td> <td>Incorporated or Principal Place of Business in This State</td> <td style="text-align: center;"><input type="radio"/> 4</td> <td style="text-align: center;"><input type="radio"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td style="text-align: center;"><input type="radio"/> 2</td> <td style="text-align: center;"><input type="radio"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td style="text-align: center;"><input type="radio"/> 5</td> <td style="text-align: center;"><input type="radio"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td style="text-align: center;"><input type="radio"/> 3</td> <td style="text-align: center;"><input type="radio"/> 3</td> <td>Foreign Nation</td> <td style="text-align: center;"><input type="radio"/> 6</td> <td style="text-align: center;"><input type="radio"/> 6</td> </tr> </tbody> </table>		PTF	DFT		PTF	DFT	Citizen of this State	<input type="radio"/> 1	<input type="radio"/> 1	Incorporated or Principal Place of Business in This State	<input type="radio"/> 4	<input type="radio"/> 4	Citizen of Another State	<input type="radio"/> 2	<input type="radio"/> 2	Incorporated and Principal Place of Business in Another State	<input type="radio"/> 5	<input type="radio"/> 5	Citizen or Subject of a Foreign Country	<input type="radio"/> 3	<input type="radio"/> 3	Foreign Nation	<input type="radio"/> 6	<input type="radio"/> 6
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Citizen or Subject of a Foreign Country	<input type="radio"/> 3	<input type="radio"/> 3	Foreign Nation	<input type="radio"/> 6	<input type="radio"/> 6																				

IV. CASE ASSIGNMENT AND NATURE OF SUIT

(Place an X in one category, A-N, that best represents your Cause of Action and one in a corresponding Nature of Suit)

<p><input type="radio"/> A. Antitrust</p> <p><input type="checkbox"/> 410 Antitrust</p>	<p><input type="radio"/> B. Personal Injury/Malpractice</p> <p><input type="checkbox"/> 310 Airplane</p> <p><input type="checkbox"/> 315 Airplane Product Liability</p> <p><input type="checkbox"/> 320 Assault, Libel & Slander</p> <p><input type="checkbox"/> 330 Federal Employers Liability</p> <p><input type="checkbox"/> 340 Marine</p> <p><input type="checkbox"/> 345 Marine Product Liability</p> <p><input type="checkbox"/> 350 Motor Vehicle</p> <p><input type="checkbox"/> 355 Motor Vehicle Product Liability</p> <p><input type="checkbox"/> 360 Other Personal Injury</p> <p><input type="checkbox"/> 362 Medical Malpractice</p> <p><input type="checkbox"/> 365 Product Liability</p> <p><input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability</p> <p><input type="checkbox"/> 368 Asbestos Product Liability</p>	<p><input type="radio"/> C. Administrative Agency Review</p> <p><input type="checkbox"/> 151 Medicare Act</p> <p><u>Social Security</u></p> <p><input type="checkbox"/> 861 HIA (1395ff)</p> <p><input type="checkbox"/> 862 Black Lung (923)</p> <p><input type="checkbox"/> 863 DIWC/DIWW (405(g))</p> <p><input type="checkbox"/> 864 SSID Title XVI</p> <p><input type="checkbox"/> 865 RSI (405(g))</p> <p><u>Other Statutes</u></p> <p><input type="checkbox"/> 891 Agricultural Acts</p> <p><input type="checkbox"/> 893 Environmental Matters</p> <p><input type="checkbox"/> 890 Other Statutory Actions (If Administrative Agency is Involved)</p>	<p><input type="radio"/> D. Temporary Restraining Order/Preliminary Injunction</p> <p>Any nature of suit from any category may be selected for this category of case assignment.</p> <p>*(If Antitrust, then A governs)*</p>
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<p><input type="radio"/> E. General Civil (Other)</p> <p><u>Real Property</u></p> <p><input type="checkbox"/> 210 Land Condemnation</p> <p><input type="checkbox"/> 220 Foreclosure</p> <p><input type="checkbox"/> 230 Rent, Lease & Ejectment</p> <p><input type="checkbox"/> 240 Torts to Land</p> <p><input type="checkbox"/> 245 Tort Product Liability</p> <p><input type="checkbox"/> 290 All Other Real Property</p> <p><u>Personal Property</u></p> <p><input type="checkbox"/> 370 Other Fraud</p> <p><input type="checkbox"/> 371 Truth in Lending</p> <p><input type="checkbox"/> 380 Other Personal Property Damage</p> <p><input type="checkbox"/> 385 Property Damage Product Liability</p>	<p>OR</p>	<p><input checked="" type="radio"/> F. Pro Se General Civil</p> <p><u>Bankruptcy</u></p> <p><input type="checkbox"/> 422 Appeal 27 USC 158</p> <p><input type="checkbox"/> 423 Withdrawal 28 USC 157</p> <p><u>Prisoner Petitions</u></p> <p><input type="checkbox"/> 535 Death Penalty</p> <p><input type="checkbox"/> 540 Mandamus & Other</p> <p><input type="checkbox"/> 550 Civil Rights</p> <p><input type="checkbox"/> 555 Prison Conditions</p> <p><input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement</p> <p><u>Property Rights</u></p> <p><input type="checkbox"/> 820 Copyrights</p> <p><input type="checkbox"/> 830 Patent</p> <p><input type="checkbox"/> 840 Trademark</p> <p><u>Federal Tax Suits</u></p> <p><input type="checkbox"/> 870 Taxes (US plaintiff or defendant)</p> <p><input type="checkbox"/> 871 IRS-Third Party 26 USC 7609</p>
<p><u>Real Property</u></p> <p><input type="checkbox"/> 210 Land Condemnation</p> <p><input type="checkbox"/> 220 Foreclosure</p> <p><input type="checkbox"/> 230 Rent, Lease & Ejectment</p> <p><input type="checkbox"/> 240 Torts to Land</p> <p><input type="checkbox"/> 245 Tort Product Liability</p> <p><input type="checkbox"/> 290 All Other Real Property</p> <p><u>Personal Property</u></p> <p><input type="checkbox"/> 370 Other Fraud</p> <p><input type="checkbox"/> 371 Truth in Lending</p> <p><input type="checkbox"/> 380 Other Personal Property Damage</p> <p><input type="checkbox"/> 385 Property Damage Product Liability</p>	<p><u>Forfeiture/Penalty</u></p> <p><input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881</p> <p><input type="checkbox"/> 690 Other</p> <p><u>Other Statutes</u></p> <p><input type="checkbox"/> 375 False Claims Act</p> <p><input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))</p> <p><input type="checkbox"/> 400 State Reapportionment</p> <p><input type="checkbox"/> 430 Banks & Banking</p> <p><input type="checkbox"/> 450 Commerce/ICC Rates/etc.</p> <p><input type="checkbox"/> 460 Deportation</p> <p><input type="checkbox"/> 462 Naturalization Application</p> <p><input type="checkbox"/> 465 Other Immigration Actions</p>	<p><input type="checkbox"/> 470 Racketeer Influenced & Corrupt Organization</p> <p><input type="checkbox"/> 480 Consumer Credit</p> <p><input type="checkbox"/> 490 Cable/Satellite TV</p> <p><input type="checkbox"/> 850 Securities/Commodities/Exchange</p> <p><input type="checkbox"/> 896 Arbitration</p> <p><input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision</p> <p><input type="checkbox"/> 950 Constitutionality of State Statutes</p> <p><input type="checkbox"/> 890 Other Statutory Actions (if not administrative agency review or Privacy Act)</p>

12

<input type="radio"/> G. Habeas Corpus/ 2255 <input type="checkbox"/> 530 Habeas Corpus – General <input type="checkbox"/> 510 Motion/Vacate Sentence <input type="checkbox"/> 463 Habeas Corpus – Alien Detainee	<input type="radio"/> H. Employment Discrimination <input type="checkbox"/> 442 Civil Rights – Employment (criteria: race, gender/sex, national origin, discrimination, disability, age, religion, retaliation) *(If pro se, select this deck)*	<input type="radio"/> I. FOIA/Privacy Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 890 Other Statutory Actions (if Privacy Act) *(If pro se, select this deck)*	<input type="radio"/> J. Student Loan <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (excluding veterans)
<input type="radio"/> K. Labor/ERISA (non-employment) <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 740 Labor Railway Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="radio"/> L. Other Civil Rights (non-employment) <input type="checkbox"/> 441 Voting (if not Voting Rights Act) <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 445 Americans w/Disabilities – Employment <input type="checkbox"/> 446 Americans w/Disabilities – Other <input type="checkbox"/> 448 Education	<input type="radio"/> M. Contract <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"/> 153 Recovery of Overpayment of Veteran’s Benefits <input type="checkbox"/> 160 Stockholder’s Suits <input type="checkbox"/> 190 Other Contracts <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<input type="radio"/> N. Three-Judge Court <input type="checkbox"/> 441 Civil Rights – Voting (if Voting Rights Act)

V. ORIGIN
 1 Original Proceeding
 2 Removed from State Court
 3 Remanded from Appellate Court
 4 Reinstated or Reopened
 5 Transferred from another district (specify)
 6 Multi-district Litigation
 7 Appeal to District Judge from Mag. Judge
 8 Multi-district Litigation – Direct File Judge

VI. CAUSE OF ACTION (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE.)
 28 U.S.C. 1391

VII. REQUESTED IN COMPLAINT	CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 <input type="checkbox"/>	DEMAND \$ _____	JURY DEMAND: YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
VIII. RELATED CASE(S) IF ANY	(See instruction)	YES <input type="checkbox"/> NO <input type="checkbox"/>	If yes, please complete related case form

DATE: 10/26/2017 SIGNATURE OF ATTORNEY OF RECORD:

INSTRUCTIONS FOR COMPLETING CIVIL COVER SHEET JS-44
 Authority for Civil Cover Sheet

The JS-44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and services 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. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. Listed below are tips for completing the civil cover sheet. These tips coincide with the Roman Numerals on the cover sheet.

- I. COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF/DEFENDANT (b) County of residence: Use 11001 to indicate plaintiff if resident of Washington, DC, 88888 if plaintiff is resident of United States but not Washington, DC, and 99999 if plaintiff is outside the United States.
- III. CITIZENSHIP OF PRINCIPAL PARTIES: This section is completed only if diversity of citizenship was selected as the Basis of Jurisdiction under Section II.
- IV. CASE ASSIGNMENT AND NATURE OF SUIT: The assignment of a judge to your case will depend on the category you select that best represents the primary cause of action found in your complaint. You may select only one category. You must also select one corresponding nature of suit found under the category of the case.
- VI. CAUSE OF ACTION: Cite the U.S. Civil Statute under which you are filing and write a brief statement of the primary cause.
- VIII. RELATED CASE(S), IF ANY: If you indicated that there is a related case, you must complete a related case form, which may be obtained from the Clerk’s Office.

Because of the need for accurate and complete information, you should ensure the accuracy of the information provided prior to signing the form.

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Bernie Sanders Donor Files Fraud Class Action Against Democratic National Committee](#)
