

**FILED**

**NOV - 6 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

3312 Ralston Street )

Fort Wayne, IN 46805 )

JOHN DOEs 1 to 435, )

JANE DOEs 1 to 435, )

To Be Named Later, )

individually, and on behalf of )

all those similarly situated, )

)

Plaintiffs, )

DEMAND FOR JURY TRIAL

vs. )

John Podesta, Chairman )

Hillary For America, )

One Pierrepont Plaza, )

Brooklyn, NY 11201 )

Kim Fritts, CEO, , )

Podesta Group, )

1001 G Street, NW 990 E )

Washington, DC 20001 )

**Case: 1:17-cv-02330 Jury Demand  
Assigned To : Chutkan, Tanya S.  
Assign. Date : 11/6/2017  
Description: Pro Se Gen. Civil F Deck**

**RECEIVED**

**NOV - 6 2017**

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

Kim Fritts, CEO )  
ARMZ Uranium Holding Comp. )  
22B Drovyanoi Lane, )  
Moscow, Russia )  
Glen Simpson, CEO, Bean LLC, )  
d/b/a Fusion GPS, Suite 400 )  
1700 Connecticut Ave, NW )  
Washington, DC 20009 )  
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, )  
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 )  
HUMA ABEDIN, )  
254 Park Avenue South )  
NY, NY 10010 )  
ANTHONY WEINER, )  
254 Park Avenue South )  
NY, NY 10010 )  
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, PODESTA GROUP, ARMZ URANIUM HOLDING COMPANY, FUSION GPS, HILLARY FOR AMERICA, 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 Defendants John Podesta and, Deborah "Debbie" Wasserman Schultz reside 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, Hillary For America, (HFA), at all times relevant hereto, was and is a not-for-profit corporation organized under the laws of the New York State and was the de facto controlling entity for the Democratic National Committee from August 26th, 2015 to on or about December 1st, 2016.

5. Defendant, John Podesta, Chairman, Hillary for America.

6. Defendant, Podesta Group, at all times relevant hereto, was and is a for profit corporation organized under the laws of the District of Columbia.

7. Defendant, ARMZ Uranium Holding Company, at all times relevant hereto, was and is a not-for-profit corporation organized under the laws of the Russian Federation.

8. Defendant, Kim Fritts, CEO of Podesta Group and ARMZ Uranium Holding Company.

9. Defendant, Fusion GPS, at all times relevant hereto, was and is a for-profit corporation organized under the laws of the District of Columbia

10. Defendant, Glen Simpson, CEO of Fusion GPS.

11. 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.

12. 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.

13. 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.

14. 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.

15. 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.

16. 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.

17. 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.

18. 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.

19. 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**

20. 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**

21. 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.

22. 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.

23. 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.

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

25. The Podesta Group is a lobbying firm located and doing business in Washington, DC for the last thirty years.

26. Hillary For America was the not-for-profit campaign entity of the Hillary Clinton 2016 Presidential Campaign, located in Brooklyn, New York.

27. On August 26, 2015, the DNC signed an agreement with Hillary For America giving financial control and substantial management oversight including selection and approval of personnel to Hillary For America.

28. ARMZ Uranium Holding Company was a company established by the principals of the Podesta Group to trade uranium in foreign weapons markets.

29. 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[.]”<sup>6 5</sup> 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).<sup>6</sup> See Ellen Nakashima, “Russian government hackers penetrated DNC, stole opposition research on Trump,” The Washington Post (June 14, 2016)

30. 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 7th, 2016. Upon information and belief, we believe these actors to be associated with Defendant Fusion GPS and Defendant Imran Awan.

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.<sup>8</sup> 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”; (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**

31. 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.

32. 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”).

28. 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.”

33. 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.”

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

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

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

37. 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.

38. 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.

39. 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.

40. 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.

41. 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)**

42. The DNC Donor Class Plaintiffs and the Sanders Donor Class Plaintiffs re-allege paragraphs 1 through 36 above as if fully set forth herein.

43. Defendant Imran Awan illegally moved data from DNC servers to servers at Hillary For America in Brooklyn, NY, 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.

44. Defendant Imran Awan engineered a sophisticated email phishing attack against Bernie Sanders supporters nationwide using a scheme that substituted a similar URL for the donation processing company ActBlue. The ActBlue URL was changed by one letter from [www.actblue.com](http://www.actblue.com) to

[www.actblues.com](http://www.actblues.com), routing donations intended for Bernie Sanders to bank accounts controlled by Debbie Wasserman-Schultz and/or Imran Awan.

45. Defendant Imran Awan 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.actblue.com](http://www.actblue.com) to [www.actblues.com](http://www.actblues.com), routing donations intended for Progressive candidates to bank accounts controlled by Debbie Wasserman-Schultz and/or Imran Awan.

46. Defendants concocted a false narrative that the Russian government had been responsible for the hacking and phishing attacks to the DNC. In fact, the truth was Defendant Fusion GPS had hired an MI6 operative of the British Government, Christopher Steele, to organize a group of ex-Russian spies to infiltrate the United States. A total of Nine (9) million dollars \$US was paid for Russian surveillance operations in the United States with a false cover of funding the "Trump Dossier". Upon information and belief, these Russian spies were located in Centreville, MD. In addition, Defendant Podesta Group had created Defendant ARMZ Uranium Company in 2012 to broker nuclear fuel and weapons deals to foreign countries including but not limited to Pakistan, Iran, UAE, Saudi Arabia, Morocco, Algeria, Tunisia, Libya, Egypt, Sudan, Nigeria, and Rwanda to fund the Hillary For America campaign in 2015. In addition, the Podesta Group acted as a foreign agent of the Saudi government and never disclosed this fact in FARA declarations while having control of the DNC. This act is committed a fraud on the DNC Donor Class, the Sanders Donor Class, and the Democratic

Party Class who did not realize they were in effect, paying for favors for the Saudi government.

47. Defendants 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. At no time did the Defendants acknowledge they have signed a "Joint Funding Agreement" which gave financial control and management right of refusal to Hillary For America over DNC.

48. 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.

49. 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 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.

50. Defendants' conduct 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)**

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

52. 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.

53. 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.

54. 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.

55. 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.

56. 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.

57. 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.

58. 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.

59. 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. Upon information and belief, the Defendant Podesta Group parlayed this hacked information in a pay to play scheme to sell nuclear fuel and depleted uranium weapons through Defendant ARMZ Uranium Holding Company to foreign nations including but not limited to Pakistan, Iran, UAE, Saudi Arabia, Morocco, Algeria, Tunisia, Libya, Egypt, Sudan, Nigeria, and Rwanda to fund the Hillary For America campaign in 2015.

60. Upon information and belief, John Podesta, Kim Fritts, 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 configured 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.

61. 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).

62. 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.

63. 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.

64. 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.

65.. 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. We have not named her in this lawsuit, but we intend to call her as a witness in this matter.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs pray for a judgment:

66. 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.

67. 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;

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

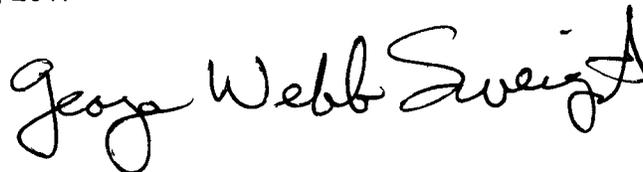
69. For compensatory, general, restitutionary, restorative, statutory, treble, and special damages for Plaintiffs against Defendants, we recommend damages of \$300,000,000 (THREE HUNDRED MILLION US DOLLARS);

70. Exemplary/punitive damages as against Defendants in an amount sufficient to deter and to make an example of Defendants; Prejudgment and post-judgment interest; we recommend damages of \$600,000,000 (SIX HUNDRED MILLION US DOLLARS);and

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

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

DATED: November 6th, 2017

A handwritten signature in black ink that reads "George Webb Sweigert". The signature is written in a cursive, flowing style.

RESPECTFULLY SUBMITTED, /s/: George Webb Sweigert

By: George Webb Sweigert

3312 Ralston Drive

Fort Wayne, IN 46805

503-919-0748

[georg.webb@gmail.com](mailto: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**

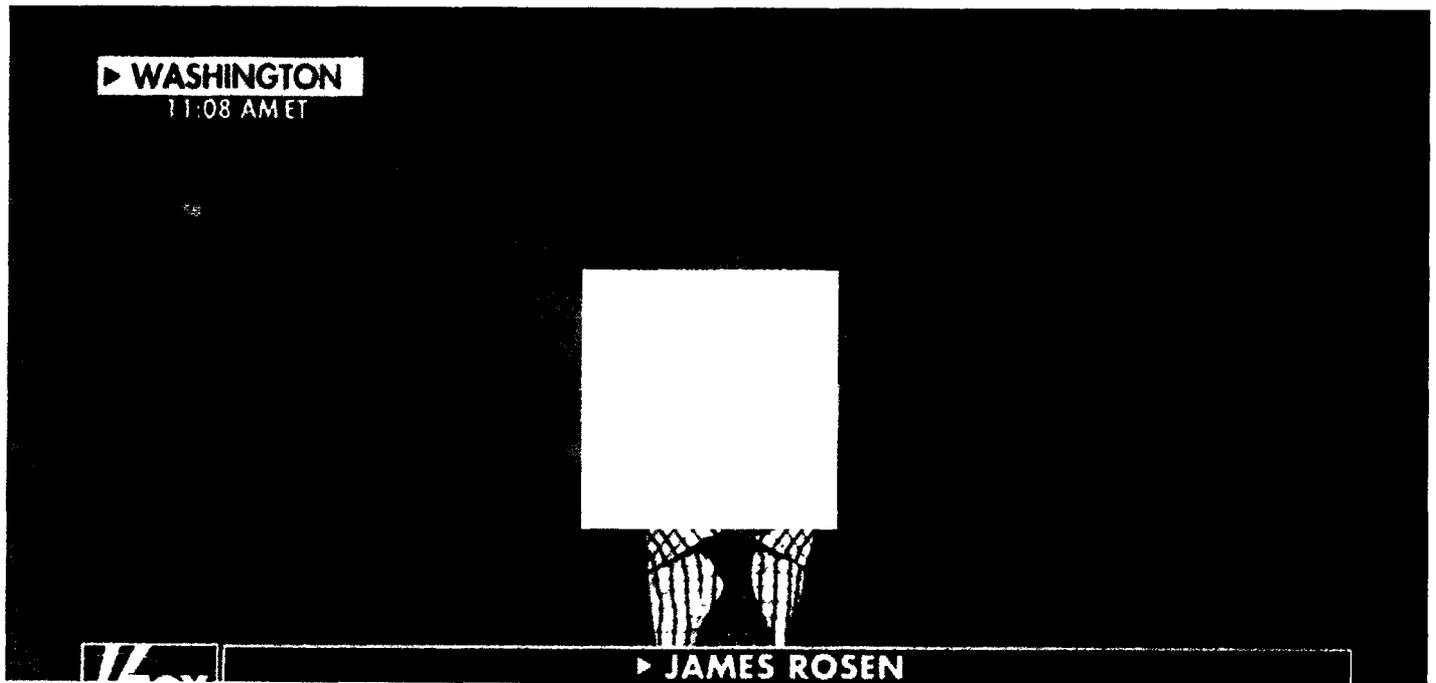
EXHIBIT A

DEMOCRATS · 3 days ago

# Donna Brazile: I found 'proof' the DNC rigged the nomination for Hillary Clinton



By Alex Pappas | Fox News



00:00 / 02:49

## Brazile claims DNC rigged system to throw primary to Hillary

Donna Brazile, a Democratic Party insider who says she helped the Clinton campaign look over the Democratic National Committee, says she found proof that the DNC rigged the system to throw the primary to Hillary Clinton.

The fix was in after all.

11/6/2017

Last year's presidential primary between Hillary Clinton and Bernie Sanders was rigged by the Democratic National Committee - just as Sanders' supporters suspected - to hand the nomination to Clinton, according to a bombshell claim by Donna Brazile. The onetime Clinton confidante, CNN commentator and former interim party boss made the explosive claim Thursday while touting a new book that could sever her ties to Team Clinton for good.

"I had promised Bernie when I took the helm of the Democratic National Committee after the convention that I would get to the bottom of whether Hillary Clinton's team had rigged the nomination process, as a cache of emails stolen by Russian hackers and posted online had suggested," Brazile wrote in a piece for Politico Magazine.



Reuters. (Donna Brazile made the explosive claim Thursday she uncovered evidence during the 2016 presidential campaign that Hillary Clinton's campaign "rigged the nomination process" through a secret arrangement with the Democratic National Committee.)

"By Sept. 7, the day I called Bernie, I had found my proof and it broke my heart," Brazile said.

The proof, according to Brazile, was a joint fundraising agreement document between the DNC, the Hillary Victory Fund and Hillary for America. It had been signed in August 2015, four months after Clinton announced her candidacy and a year before she officially secured the nomination over Sanders.

**HILLARY CLINTON SAID TRUMP'S REACTION TO NYC TRUCK RAMPAGE LACKED 'EMPATHY'**



The agreement with the DNC was signed in August 2015, four months after Hillary Clinton announced her candidacy and a year before she officially secured the nomination over rival Bernie Sanders. (Mikayla Whitmore/Las Vegas Sun via AP)

**Texas officials hold press conference on chu**

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"The agreement—signed by Amy Dacey, the former CEO of the DNC, and Robby Mook with a copy to Marc Elias—specified that in exchange for raising money and investing in the DNC, Hillary would control the party's finances, strategy, and all the money raised," Brazile wrote. "Her campaign had the right of refusal of who would be the party communications director, and it would make final decisions on all the other staff."

Brazile took over as the interim DNC chairman in 2016 when Florida Rep. Debbie Wasserman Schultz was forced out as chairman over the emails, which indicated the party organization unfairly favored Clinton over Sanders during the primary.

The ardent supporters of Sanders, the Democratic socialist, have long accused the party establishment of actively taking steps to benefit Clinton during the primary.



Florida Rep. Debbie Wasserman Schultz was forced out as chairman over the emails, which indicated the party organization unfairly favored Clinton over Sanders during the primary. (AP)

In a statement to Fox News, Wasserman Schultz didn't directly address Brazile's claims, but defended her tenure leading the committee.

"It was a tremendous honor to be asked by President Obama to serve as chair of the DNC," Wasserman Schultz said Thursday. "I am proud of the work our team did to support Democrats up and down the ballot in the 2016 election and to re-elect the president in 2012."

DNC spokesman Xochitl Hinojosa, who works under current DNC chairman Tom Perez, told Fox News the party's official policy is to not take sides during the primaries.

"The DNC must remain neutral in the presidential primary process, and there shouldn't even be a perception that the DNC is interfering in that process," Hinojosa said.



Democratic presidential nominee Hillary Clinton in a file photo. (Reuters)

She said joint fundraising committees were created between the DNC and the Clinton and Sanders campaigns during the 2016 cycle but Clinton was the only candidate who raised money for the party.

The piece, titled "Inside Hillary Clinton's secret takeover of the DNC," is excerpted from Brazile's forthcoming book, which is being published this month.

After taking over, she said she went in search for "evidence of internal corruption that would show that the DNC was rigging the system to throw the primary to Hillary."

"I had been wondering why it was that I couldn't write a press release without passing it by Brooklyn," she wrote. "Well, here was the answer."

It's typical, she said, for candidates to make such arrangements with party organizations – but after they've won the nomination. Brazile said the arrangement does not appear to be "illegal, but it sure looked unethical."

"If the fight had been fair, one campaign would not have control of the party before the voters had decided which one they wanted to lead," she said. "This was not a criminal act, but as I saw it, it compromised the party's integrity."

EXHIBIT B

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## INVESTIGATIVE GROUP

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



## Tony Podesta Lobbied For Russia's 'Uranium One' And Did Not File As A Foreign Agent



RICHARD POLLOCK



(<http://dailycaller.com/author/richard-pollock/>)

Reporter

(<http://dailycaller.com/author/richard-pollock/>)



3905



3449



Tony Podesta’s lobbying firm, the Podesta Group, represented the Russian-owned company Uranium One during former President Barack Obama’s administration and did not register under the Foreign Agents Registration Act, The Daily Caller News Foundation has determined.

Podesta collected lobbying fees (<https://www.opensecrets.org/lobby/clientlbs.php?id=D000065156&year=2015>) of \$180,000 from Uranium One, according to the non-partisan Center for Responsive Politics, that discloses lobbying documents filed with Congress. The uranium company states on its web site (<http://www.uranium1.com/about-us/#uig>) it is a “wholly owned subsidiary” of RUSANO, the Russian State Corporation for Nuclear Energy.

Special Counsel Robert Mueller already is scrutinizing Podesta and his firm for allegedly failing to register as a lobbyist for the European Center for a Modern Ukraine, a Ukrainian government entity. His role there is tied up with former Trump campaign chairman Paul



Manafort who was indicted on 12 counts on Oct. 30, including the failure to register under the Foreign Agents Registration Act (FARA).

A cabinet-led federal committee that included former Secretary of State Hillary Clinton, approved the sale of Uranium One to RUSANO in 2010, that permitted Russia to acquire twenty percent of America's uranium reserves.

The sale of Uranium One to Russia today is the subject of at least three separate congressional committee investigations trying to determine if Bill Clinton and the Clinton Foundation received large financial gifts from Russians and from Uranium One's owner and CEO. The committees are trying to determine if the gifts paved the way for the sale.

The committees also are looking into new reports that an FBI informant obtained damaging criminal activity information on the Russian side of the sale which was never passed on to the Committee on Foreign Investment in the United States (CFIUS), the cabinet-level committee that had to approve sales of U.S. companies and strategic assets to foreign countries.

The committees investigating Uranium One are the House Permanent Select Committee on Intelligence, the House Oversight and Government Reform Committee, and the Senate Judiciary Committee.

The Podesta Group lobbied on behalf of Uranium One for part of 2012 and in 2014 and 2015, according (<https://www.opensecrets.org/lobby/clientlbs.php?id=D000065156&year=2015>) to the Center for Responsive Politics. The Podesta Group was not listed as a lobbyist for Uranium One during its sale to ROSATOM in 2010.

The Podesta Group did not file under FARA during any of the years when it lobbied both Congress and the executive branch, according to the Justice Department website (<https://www.fara.gov/quick-search.html>).

Reporting requirements under FARA demand far more rigorous public disclosure requirements — including contract information — than reports filed under congressional lobbying disclosure rules.

“The Podesta Group takes legal compliance seriously, and it complied with the law here,” a Podesta Group company spokesman told TheDCNF.

GOP Rep. Devin Nunes of Calif., who chairs the House intelligence committee, told TheDCNF he is concerned about the Podesta’s lobbying activities for Uranium One and its decision not to file under FARA.

“This would be yet another unusual and concerning development around the Uranium One issue that Congress will be looking into,” Nunes said in a statement.

The question of whether companies representing foreign government entities should file under FARA got a jolt on Oct. 30 when Mueller issued an indictment (<https://www.justice.gov/file/1007271/download>) of Manafort and Richard Gates, Manafort’s long-time business associate.

The Special Counsel’s action raised FARA compliance to a new level with his charge that Manafort and Gates should have registered under FARA.

“From in and about and between 2008 and 2014, both dates being approximate and inclusive, within the District of Columbia and elsewhere, the defendants Paul J. Manafort, Jr., and Richard W. Gates III knowingly and willfully, without registering with the Attorney General as required by law, acted as agents of a foreign principal, to wit, the Government of Ukraine,” the indictment stated.

GOP Sen. Chuck Grassley of Iowa, the chairman of the Senate Judiciary Committee — another committee looking into the Uranium One sale — hailed Mueller's decision to go after FARA violators.

"It's good to see the Justice Department taking seriously its responsibility to enforce the Foreign Agents Registration Act," Grassley said in a statement (<https://www.grassley.senate.gov/news/news-releases/grassley-statement-indictments-filed-special-counsel's-office>) issued after the Manafort indictment. "I've been raising concerns about lackluster enforcement of this foreign influence disclosure law for years now, regardless of administration or political party."

"The dirty little secret is that lots of people across the political spectrum in Washington have skirted their FARA registration obligations for years with little to no accountability," he added.

The Podesta Group is referred to throughout the Manafort indictment as "Company B," according to NBC News (<https://www.nbcnews.com/news/investigations/sources-podesta-group-mercury-are-companies-b-indictment-n815721>), citing three unnamed sources with knowledge of the investigation.

Mueller is "sending a signal" about getting tough on FARA enforcement, Scott MacGriff, who left the Justice Department last November after eight years as a fraud attorney and now serves the law firm of Dickinson Wright, told TheDCNF.

"It may be that Mueller is trying to send a signal that it's no longer going to be observed in the breach and FARA filings can no longer be an afterthought," MacGriff said in an interview with TheDCNF. "It's a signal and a reminder that companies have an affirmative obligation to take a closer look at their responsibilities under FARA."

Former U.S. Attorney Joseph diGenova agreed. "The FARA filings are very, very important as witnessed by the Manafort indictment. And they're viewed that way now by the government apparently with some rigor," he told TheDCNF.

The Special Counsel has subpoenaed Podesta to testify and has requested records from the Podesta Group, according to The New York Times (<https://www.nytimes.com/2017/10/30/us/politics/tony-podesta-resignation-lobbying.html>). The Special Counsel's office would not provide to TheDCNF deadlines facing Podesta and his company. ^

Feeling pressure from the Special Counsel's deepening probe, however, on Oct 30 Podesta took the dramatic step to resign from the lobbying giant he co-founded with his brother John Podesta in 1988. His brother served as Hillary Clinton's national 2016 campaign chairman, served as chief of staff in Bill Clinton's White House and served as "special counselor" to Obama.

In the Manafort case, the Podesta Group did not file under FARA after years of lobbying for the European Center which supported Viktor Yanukovich, Ukraine's pro-Russian president. Yanukovich fled to Russia after he was deposed by its parliament as unruly street demonstrations rocked the country.

Only in April (<https://www.fara.gov/quick-search.html>) of this year did the Podesta Group retroactively register as a foreign agent for the European Center. Manafort belatedly registered as a foreign agent in June (<https://lawfareblog.com/whats-actually-manafort-fara-filing>) as well.

The retroactive registration did not help Manafort and he was indicted by the Special Counsel.

Uranium One touched Bill and Hillary Clinton along with their long-time friend Frank Giustra who was the owner of Uranium One. Bill received \$500,000 for a speaking engagement (<http://www.nationalreview.com/article/446526/clinton-russia-ties-bill-hillary-sold-out-us-interests-putin-regime>) in Moscow only three weeks after ROSATOM announced its bid for Uranium One. Bill and Giustra co-founded the Clinton-Giustra Enterprise Partnership.

The Clinton Foundation's website reports (<https://www.clintonfoundation.org/contributors>) that Giustra donated more than \$25 million. Peter Schweizer, author of "Clinton Cash" found nine Uranium One investors donated \$145 million (<http://nypost.com/2017/10/17/team-obamas-stunning-coverup-of-russian-crimes/>) to the Clinton Foundation.

Uranium One burst back into national news on Oct. 25 in the wake of reports (<http://thehill.com/homenews/senate/357230-fbi-informant-in-obama-era-russian-nuclear-bribery-cleared-to-testify-before>) from The Hill and Circa that an FBI informant possessed corruption information concerning the Russian parties that was withheld from Congress, as well as from the CIFIUS board.

Despite the FBI's critical information, in 2010 the Obama administration — including Clinton — approved the sale to ROSATOM. The sale effectively handed over 20 percent of America's uranium reserves to Moscow.

As Secretary of State, Clinton voted to approve the sale of Uranium One before CIFIUS. So did Attorney General Eric Holder whose FBI held the information of criminal activity.

The Podesta Group defended its decision not to file under FARA regarding Uranium One, saying they were exempt from FARA under a Justice Department rule in 28 CFR 5.304 paragraph C.

The Podesta Group "complied with the law here by following a Department of Justice rule that is specifically intended to cover firms that represent any business 'owned in whole or in part by a foreign government,'" a Podesta spokesman told TheDCNF.

The paragraph (<https://www.law.cornell.edu/cfr/text/28/5.304>) in question exempts firms from FARA registration that engage in political activities on behalf of a foreign corporation — "even if owned in whole or in part by a foreign government" — as long as the corporation is not directed by a foreign government or foreign political party, and as long as the activities do not "directly promote" the public or political interests of a foreign government or foreign political party.

Dan Pickard, an attorney at Wiley Rein who handles FARA issues, told TheDCNF he believes the Podesta Group should have registered under FARA.

"It is important to note that exemptions are not applicable where the foreign principal is either a government of a foreign country or a foreign political party," Pickard told TheDCNF in an interview.

DiGenova agrees. "If you are representing a foreign government, person or entity, you have to register under FARA," he said, adding: "The failure to file a FARA registration would require some scrutiny."

MacGriff says Section 22 of the U.S. Code provides guidance to companies about whether or not they should register under FARA.

"An Agent of a foreign principal is defined by statute at 22 U.S.C. section 611(c) to include any person whose activities are directly or indirectly supervised, directed, controlled, financed or subsidized in whole or in major part by a foreign principal," he told TheDCNF. ^

“Where there is uncertainty as to whether a foreign government directly or indirectly ‘supervised, directed, controlled, financed or subsidized in whole or in major part’ the underlying activities, prudence dictates making a FARA filing in an overabundance of caution,” MacGriff said.

ROSATOM’s chairman is Boris Gryzlov, who is a senior Kremlin insider. He served as Speaker of the Duma from 2003 to 2011. He also was a member of the Russian Federation Security Council, according to Bloomberg News.

<https://www.bloomberg.com/profiles/people/3216383-boris-vyacheslavovich-gryzlov>

ROSATOM is “often compared with a government ministry, it has a clout in Moscow matched only by oil and gas giants Rosneft and Gazprom,” the Financial Times reported (<https://www.ft.com/content/774358b4-5a4a-11e7-9bc8-8055f264aa8b>).

Follow Richard on Twitter (<https://twitter.com/rpollockDC>)

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**Tags:** Joseph DiGenova (<http://dailycaller.com/buzz/joseph-digenova/>), Paul Manafort (<http://dailycaller.com/buzz/paul-manafort/>), The Podesta Group (<http://dailycaller.com/buzz/the-podesta-group/>)

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<input type="radio"/> <b>K. Labor/ERISA (non-employment)</b>  <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"/> <b>L. Other Civil Rights (non-employment)</b>  <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"/> <b>M. Contract</b>  <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"/> <b>N. Three-Judge Court</b>  <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

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

**VII. REQUESTED IN COMPLAINT**

CHECK IF THIS IS A CLASS ACTION UNDER F R C P 23

DEMAND \$ \$ 300,000,000      JURY DEMAND: YES  NO

**VIII. RELATED CASE(S) IF ANY**

(See instruction)      YES       NO

If yes, please complete related case form

DATE: NOV 6, 2017

SIGNATURE OF ATTORNEY OF RECORD: Jay Webb Scott

**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: [Indiana Man Files Another Class Action Against DNC, Staffers](#)

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