

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

DEMOCRATIC CONGRESSIONAL
CAMPAIGN COMMITTEE, INC.,
430 South Capitol Street, S.E.
Washington, D.C. 20003,

Plaintiff

v.

TOM DELAY,
341 Cannon House Office Building
Washington, D.C. 20515,

U.S. FAMILY NETWORK, INC.,
SERVE ON:
William J. Olson
8180 Greensboro Drive, Suite 1070
McLean, VA 22101,

REPUBLICAN MAJORITY ISSUES
COMMITTEE, INC.,
SERVE ON:
Karl Gallant
9506 Gauge Drive
Fairfax Station, Virginia 22039,

AMERICANS FOR ECONOMIC GROWTH,
INC.,
SERVE ON:
James W. Ellis
102 W. 3rd Street, Suite 650
Winston-Salem, NC 27101,

and

DOES 1-20,

Defendants.

CIVIL ACTION NO. _____

JURY TRIAL DEMANDED

**COMPLAINT FOR MONETARY AND INJUNCTIVE RELIEF UNDER
THE RACKETEER INFLUENCED AND CORRUPT
ORGANIZATIONS ACT**

Plaintiff Democratic Congressional Campaign Committee, Inc. ("DCCC") in support of this complaint, hereby avers as follows:

I. PARTIES

1. Plaintiff DCCC is a nonprofit corporation organized under the laws of the District of Columbia. Its principal offices are located in the District of Columbia. DCCC is a political committee established and maintained by the Democratic Party, a national political party as defined and used in 2 U.S.C. §441a, and is the House campaign committee as defined and used by the Federal Election Commission ("FEC"), 11 C.F.R. §10.2(c)(2)(ii). The organizational purposes and functions of DCCC are, among other things, to aid and encourage election of Democratic candidates to the United States House of Representatives (the "House") by, among other things, contributing money to the campaigns of Democratic House candidates, making expenditures on behalf of the campaigns of Democratic House candidates, recruiting Democratic candidates for the House, advising Democratic House candidates and campaigns, and building the Democratic Party at all levels. DCCC conducts its activities in accordance with the rules prescribed for political party committees under Federal campaign finance law. In planning its activities, DCCC reviews information secured through transaction reporting requirements under Federal law with respect to the activities of Republican organizations, groups and other affiliates, in order to determine, among other things, how to allocate its resources most efficiently.

2. Defendant Tom DeLay ("DeLay") is a Member of Congress representing the Twenty-Second Congressional District of Texas. DeLay was elected to the House in 1984 and has served there since. DeLay is a "public official" for purposes of 18 U.S.C. §1951 (the Hobbs Act) and D.C. Code §22-3851, and a "person" for purposes of the Racketeer

Influenced and Corrupt Organization Act ("RICO"), 18 U.S.C. §1962. DeLay resides, is found, has an agent, or transacts his affairs in the District of Columbia.

3. Defendant U.S. Family Network, Inc., ("USFN") is a corporation organized under the laws of Virginia and claiming tax-exempt status under 26 U.S.C. §501(c)(4). Its principal offices are located in the District of Columbia. USFN is a "person" for purposes of RICO, 18 U.S.C. §1962. USFN resides, is found, has an agent, or transacts its affairs in the District of Columbia.

4. Defendant Republican Majority Issues Committee ("RMIC") is a corporation organized under the laws of Virginia and claiming tax-exempt status under 26 U.S.C. §527. Its principal offices are located in Virginia. RMIC is a "person" for purposes of RICO, 18 U.S.C. §1962. RMIC resides, is found, has an agent, or transacts its affairs in the District of Columbia.

5. Defendant Americans For Economic Growth ("AFEG") is a corporation organized under the laws of North Carolina and claiming tax-exempt status under 26 U.S.C. §501(c)(4). Its principal offices are located in Virginia. AFEG is a "person" for purposes of RICO, 18 U.S.C. §1962. AFEG resides, is found, has an agent, or transacts its affairs in the District of Columbia.

6. Hereafter, defendants USFN, RMIC and AFEG are referred to as the "Associated Organizations."

7. Doe Defendants 1 through 20 are persons whose identities are as yet unknown to DCCC and who have directed or participated in the enterprise. One or more of the Doe Defendants are "public officials" for purpose of 18 U.S.C. §1951 (the Hobbs Act) and D.C. Code §22-3851. The Doe Defendants are also "persons" for purposes of RICO, 18 U.S.C. §1962.

II. JURISDICTION

8. This Court has jurisdiction pursuant to section 1964 of RICO, 18 U.S.C. §1964, and pursuant to its jurisdiction over all civil actions arising under the Constitution, laws, or treaties of the United States, 28 U.S.C. §1331.

III. VENUE

9. Venue is proper in this Court under section 1965(a) of RICO, 18 U.S.C. §1965(a), and the general venue provisions of the United States Code, 28 U.S.C. §1391(b) & (e).

IV. FACTS

A. Defendants' Pattern of Racketeering Activity

10. DeLay is a Member of Congress representing the Twenty-Second Congressional District in Texas. Since 1987, DeLay has been a Member of the House Appropriations Committee. Since 1995, DeLay has served in the Republican leadership as Majority Whip. In this position DeLay wields substantial political power and influence. DeLay is a public official for purposes of 18 U.S.C. §1951 (the Hobbs Act) and D.C. Code §2-3851.

11. The National Republican Congressional Committee ("NRCC") is an organization whose principal offices are located in the District of Columbia. The NRCC is a political committee established and maintained by the Republican Party, a national political party as defined and used in 2 U.S.C. §441a, and is the House campaign committee as defined and used by the Federal Election Commission, 11 C.F.R. §10.2(c)(2)(ii). DeLay participates in the operation or management of the affairs of the NRCC. DeLay was instrumental in the selection of the NRCC's current chairman. After the chairman was elected, a DeLay congressional staffer was installed as NRCC executive director.

12. Americans for a Republican Majority ("ARMPAC") is a political committee as defined and used by the Federal Election Commission, 11 C.F.R. §100.5. ARMPAC is a political action committee controlled by DeLay.

13. Ed Buckham ("Buckham") is an individual who resides in Maryland and works in the District of Columbia. Buckham is DeLay's closest political advisor, having served as his House chief of staff. He founded USFN and serves as its consultant. He created RMIC and has raised funds for it. He is also a consultant to ARMPAC. He operates a for-profit consulting firm known as Alexander Strategies Group, which has shared office space with both USFN and ARMPAC.

14. Karl Gallant ("Gallant") is an individual who resides in Virginia. Gallant is a close political ally of DeLay. He currently runs RMIC and serves as its registered agent. He formerly ran ARMPAC and has served as a fundraiser for DeLay.

15. Jim Ellis ("Ellis") is an individual who resides in Virginia and works in the District of Columbia. Ellis is a close political ally of DeLay. He controls AFEG and serves as its registered agent. He also manages ARMPAC and serves as a paid consultant to the NRCC. With Buckham, Ellis is a consultant for Alexander Strategies Group.

16. DeLay, the Associated Organizations and the Doe Defendants, together with the NRCC, ARMPAC, Buckham, Gallant and Ellis, constitute an "enterprise" for purposes of RICO, 18 U.S.C. §1962, in that they are associated in fact, share a common purpose and organization, the affairs of which are conducted through a pattern of racketeering activity as set forth below.

17. Beginning in 1994 and continuing to the present, DeLay, his agents and/or others acting at DeLay's direction and on his behalf, including the Doe Defendants, have engaged in a scheme to extort political contributions from individuals and entities with

interests before Congress and to avoid otherwise applicable reporting requirements relating to donors and political contributions and expenditures.

18. The objectives of this scheme were threefold. The first objective was to sever the ties between political action committees ("PACs") and other entities with interests before Congress and individuals and organizations that had supported or were themselves associated with the Democratic Party, including DCCC.

19. The second objective was to increase the financial support of Republican candidates and party organizations by those PACs and other entities. In furtherance of those objectives, DeLay, his agents and/or others acting at DeLay's direction and on his behalf, including the Doe Defendants, threatened the PACs and other entities that if they did not contribute to Republican candidates and party organizations and sever or curtail their support of Democratic candidates and party organizations, they would not receive favorable treatment by the Republican majority in Congress.

20. Third, to facilitate the receipt of funds through the scheme, and in part to remove the sources and destinations of those funds from public view, DeLay, his agents and/or others acting at DeLay's direction and on his behalf, including the Doe Defendants, established USFN, RMIC and AFEG. By falsely asserting that they are not "political committees" under Federal law, the Associated Organizations have evaded transaction reporting requirements under Federal law.

1. Extortion in Violation of 18 U.S.C. §1951 (the Hobbs Act) and D.C. Code §2-3851

21. In furtherance of the scheme, DeLay, his agents and/or others acting at DeLay's direction and on his behalf, including the Doe Defendants, under color of official right and with the threat of unfavorable legislative action, have conspired to and have in fact extorted or attempted to extort contributions and other benefits from PACs and other entities

in violation of 18 U.S.C. §1951 and D.C. Code §2-3851. This conduct included the following:

22. DeLay, his agents and/or others acting at DeLay's direction and on his behalf, including the Doe Defendants, intimidated lobbyists, corporations, PACs and others into making contributions to Republican candidates and organizations and discontinuing or curtailing contributions to Democratic Party candidates and organizations, including DCCC. As a part of such intimidation, DeLay, his agents and/or others acting at DeLay's direction and on his behalf, including the Doe Defendants, compiled a list or "book" of the four hundred largest PACs. For each PAC the book listed to whom, and in what amount, the PAC had contributed over the past two years. The book then assigned the PAC a rating of "neutral," "friendly" or "unfriendly" depending on whether the PAC contributed more heavily to Democratic or Republican candidates. When visiting DeLay in his office, lobbyists and other PAC representatives were forced to review their PAC's rating and contribution totals and to initial the book next to the PAC's entry. One lobbyist described this conduct as "nothing more than a thinly veiled attempt at intimidation."

23. On or about March 2, 1997, DeLay was asked about his practice of keeping this ledger of contributions. DeLay replied, "I want to know who my friends are and who my enemies are." Asked what his "friends" receive in return, DeLay replied: "Good government."

24. DeLay, his agents and/or others acting at DeLay's direction and on his behalf, including the Doe Defendants, sent out campaign solicitations to PACs that had provided financial support to Democratic candidates during the 1994 election. In those solicitations DeLay stated that it was "personally important to me and the House Republican leadership team" that the PAC make future contributions to a specified Republican candidate. As a result of DeLay's conduct, the PACs of these corporations and others later altered their contribution activity to give more funds to Republican committees than to Democratic

committees. When a reporter informed Karl Gallant that he had obtained a copy from a lobbyist of one such solicitation sent by DeLay, Gallant responded: "That tells me it's effective. They want you to write a negative story so we'll back off. You just made my day." DeLay later distributed to his colleagues the news story that the reporter ultimately wrote, saying: "It had great impact. It raised him [the Republican candidate] a lot of money. We know who we sent the letters to and who we got checks from."

25. DeLay, his agents and/or others acting at DeLay's direction and on his behalf, including the Doe Defendants, informed several organizations with interests on Capitol Hill that in the future DeLay would only be willing to meet with Republican representatives of that organization. During 1995, when one corporation lobbyist sought a meeting with DeLay, DeLay telephoned the firm's CEO, complained that the lobbyist was "a hard-core liberal," and said that if the firm wanted to meet with him, "you need to hire a Republican." The lobbyist was soon transferred to London.

26. At a meeting with members of the Business Roundtable in January 1997, DeLay, his agents and/or others acting at DeLay's direction and on his behalf, including the Doe Defendants, threatened to withhold favorable action on legislation of interest to Roundtable members unless those members increased their contributions to Republican candidates and organizations and decreased or terminated their contributions to Democratic candidates and organizations.

27. During or about October 1997, DeLay, his agents and/or others acting at DeLay's direction and on his behalf, including the Doe Defendants, threatened to withhold favorable action on private property legislation of interest to the National Association of Home Builders if its PAC endorsed or contributed to Eric Vitaliano, a Democratic candidate in a special election to replace Republican Congresswoman Susan Molinari of New York. The PAC subsequently withdrew its plans to endorse and contribute to Vitaliano.

28. On or about June 17, 1998, Linda Smith, a Republican Member of Congress, said that she had discovered that it was a common practice for the GOP majority to hold up action on bills while milking interested contributors for more campaign contributions. In reaction to this practice, she said, "We do what? Isn't that extortion?"

29. During or about October 1998, DeLay, his agents and/or others acting at DeLay's direction and on his behalf, including the Doe Defendants, pressured the Electronic Industries Association ("EIA") to fire Dave McCurdy, EIA's incoming president and a former Democratic Member of Congress, and replace him with a Republican. DeLay directed a campaign in which members of the House Republican leadership called EIA member companies and urge that McCurdy be fired. At the same time, DeLay used his power as Majority Whip to block pending legislation advocated by EIA, while making it known that the legislation had been stopped because of McCurdy's hiring. EIA subsequently hired a former House Republican staff member who, shortly after being hired, attended a fundraiser for ARMPAC. When other Republican Members criticized DeLay for his conduct, DeLay retorted that Republican leaders needed to twist arms and play hardball in order to get results. During or about May 1999, the House Standards of Official Conduct Committee admonished DeLay for this conduct.

30. After the 1998 general election, in exchange of support of then-Speaker Designate Bob Livingston, DeLay demanded and was granted further authority to pressure lobbying firms and trade associations to purge Democratic leaders, stop contributing to Democratic candidates and organizations, and contribute to Republican candidates and organizations. Buckham worked to secure this authority for DeLay.

31. Most recently, following this Court's ruling on April 3, 2000, in United States v. Microsoft, Inc., (D.D.C. Civ. Action No. 98-1232), that Microsoft had violated antitrust laws, DeLay, his agents and/or others acting at DeLay's direction and on his behalf, including

the Doe Defendants, met privately with Microsoft Chairman Bill Gates and offered to assist Microsoft legislatively in exchange for increased contributions to Republican candidates and organizations.

32. DeLay's practice of extortion is notorious in the political community. DeLay is known as "The Hammer" for his threatening tactics, a nickname that he has publicly embraced. At a private event held during or about March 1999, two lobbyists presented DeLay with a hammer encased in royal blue velvet, to which DeLay responded: "This is good, because you can still hit hard, but it just doesn't leave any marks."

2. Money Laundering (18 U.S.C. §1956) and Monetary Transactions In Criminally Derived Property (18 U.S.C. §1957)

33. In addition to the extortion and attempted extortion outlined above, DeLay, is agents, and/or others acting at DeLay's direction and on his behalf, including the Doe Defendants, have established a network of political organizations (the Associated Organizations) to promote the election of Republican candidates for the United States House of Representatives and the defeat of Democratic candidates. DeLay and the Associated Organizations have furthered these goals through a pattern of racketeering activity in the form of money laundering, in violation of 18 U.S.C. §1956, and by engaging in monetary transactions in criminally derived property of a value greater than \$10,000, in violation of 18 U.S.C. §1957.

34. An important element of the Associated Organizations is the fact that these organizations are not registered with the FEC and thus do not have to disclose the source or use of their funds. The promise of contributor anonymity by DeLay and the Doe Defendants has been central to the creation and continuing operation of the Associated Organizations. The head of RMIC, Karl Gallant, has stated publicly that disclosure would place RMIC at "a tactical disadvantage."

35. As described below, the Associated Organizations, with the benefit of funds obtained through extortion, have knowingly engaged or attempted to engage in financial transactions involving proceeds of specified unlawful activity designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the proceeds or to avoid a transaction reporting requirement under State or Federal law, in violation of 18 U.S.C. §1956, and have engaged or attempted to engage in monetary transactions in property of a value greater than \$10,000 derived from specified unlawful activity, knowing that the property was derived from unlawful activity, in violation of 18 U.S.C. §1957.

a. U.S. Family Network

36. USFN is an organization claiming tax exempt status under 26 U.S.C. §501(c)(4) as a "social welfare" organization. It is not registered with the FEC and does not obey FEC transaction reporting requirements.

37. USFN was founded by Ed Buckham, DeLay's top political associate and former chief of staff, with assistance from DeLay. Buckham is USFN's leading fundraiser and has raised substantial funds for it. Buckham's wife has served as the treasurer of USFN. Until recently, the President of USFN was Robert G. Mills, who served as DeLay's 1996 campaign manager. USFN has shared office space with ARMPAC and Alexander Strategy Group, Buckham's consulting firm.

38. In 1996, USFN had \$15,000 cash on hand. Upon information and belief, through and with knowledge of DeLay's extortion and the concerted racketeering activity of DeLay, the Doe Defendants, and the other Associated Organizations, USFN raised \$1,300,000 in 1998, including \$1,000,000 from a single source.

39. In addition, on or about October 20, 1999, the NRCC transferred \$500,000 to USFN, the largest single donation the NRCC made all year. Upon the solicitation of Buckham, the NRCC Chairman, placed in his position through DeLay's efforts, made the

transfer without informing members of the NRCC's executive committee. The NRCC's deputy chairman, Dan Mattoon, said publicly that while the NRCC was initially unfamiliar with USFN, it ultimately gave the funds because Buckham could be relied upon to spend them to promote Republican Congressional candidates.

40. In addition to spending these funds to support Republican House candidates and oppose Democratic candidates, upon information and belief, USFN has also engaged in a series of lavish monetary and financial transactions involving property and proceeds derived in whole or in part from the extortion of DeLay, his agents and/or others acting at DeLay's direction and on his behalf, including the Doe Defendants. On or about January 12, 1999, USFN purchased a \$325,000 town house on Capitol Hill. On or about July 10, 1998, USFN acquired a 15-year lease on skybox seats at the MCI Center, worth \$149,000. USFN also purchased a 1997 GMC truck valued at \$27,000. The truck is registered at Buckham's personal residence in Maryland. During or about 1997, USFN paid a \$53,000 salary to Buckham's wife. During or about 1998, USFN paid \$665 for a DeLay Congressional staffer to travel to Missouri.

41. In sum, upon information and belief, at the direction of DeLay, his agents and/or others acting at DeLay's direction and on his behalf, including the Doe Defendants, USFN knowingly engaged or attempted to engage in financial transactions involving proceeds of specified unlawful activity (extortion) designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the proceeds or to avoid a transaction reporting requirement under State or Federal law, in violation of 18 U.S.C. §1956, and has engaged or attempted to engage in monetary transactions in property of a value greater than \$10,000 derived from specified unlawful activity (extortion), knowing that the property was derived from unlawful activity, in violation of 18 U.S.C. §1957.

b. RMIC

42. RMIC is an organization claiming tax-exempt status under 26 U.S.C. §27. It is not registered with the FEC and does not obey FEC transaction reporting requirements. It is run by Karl Gallant, a DeLay fundraiser who previously ran ARMPAC. Gallant has cited the secrecy of the organization's receipts and disbursements as integral to its success, saying that public disclosure would be a "tactical disadvantage" for the group.

43. DeLay and Ed Buckham conceived the organization over dinner in spring 1998, envisioning it as a get-out-the-vote campaign targeting Republican candidates in roughly two dozen House races across the country. Buckham was instrumental in RMIC's subsequent formation. RMIC has announced plans to spend as much as \$25 million on grassroots campaigns and issue advertisements in the most competitive Congressional districts. It is considered by GOP insiders as a DeLay operation, top to bottom.

44. Upon information and belief, DeLay, his agents and/or others acting at DeLay's direction and on his behalf, including the Doe Defendants, and Buckham have raised substantial funds for RMIC through the extortion of DeLay, his agents and/or others acting at DeLay's direction and on his behalf, including the Doe Defendants. By DeLay's own account, he has raised funds "continuously" for RMIC. Both DeLay and Buckham attended RMIC's first fundraiser, which was held aboard a private yacht and attended by over a dozen potential donors. During summer 1999, DeLay flew to Texas to meet with a donor and raised more than \$200,000 for RMIC.

45. Upon information and belief, over the past two years, RMIC has disposed of property and proceeds derived in whole or in part from the extortion of DeLay, his agents and/or others acting at DeLay's direction and on his behalf, including the Doe Defendants, by engaging or attempting to engage in financial and monetary transactions which include the payment of salaries of at least 10 staff members and other overhead expenses of the organization.

46. In sum, upon information and belief, at the direction of DeLay, his agents and/or others acting at DeLay's direction and on his behalf, including the Doe Defendants, RMIC knowingly engaged or attempted to engage in financial transactions involving proceeds of specified unlawful activity (extortion) designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the proceeds or to avoid a transaction reporting requirement under State or Federal law, in violation of 18 U.S.C. §1956, and has engaged or attempted to engage in monetary transactions in property of a value greater than \$10,000 derived from specified unlawful activity (extortion), knowing that the property was derived from unlawful activity, in violation of 18 U.S.C. §1957.

c. AFEG

47. AFEG is an organization claiming tax-exempt status under 26 U.S.C. §501(c)(4). It is not registered with the FEC and does not obey FEC transaction reporting requirements.

48. AFEG is controlled by Jim Ellis. Ellis also manages ARMPAC and serves as a paid consultant to the NRCC. With Buckham, Ellis is a consultant for Alexander Strategies Group. Both ARMPAC and Alexander Strategies Group have shared office space with USFN.

49. During or about November 1999, AFEG spent funds on radio advertisements attacking Democratic candidates and bearing a stark similarity to ads masterminded by DeLay that were run by the NRCC itself. Neither the contributions that funded the ads nor the disbursements for the ads were reported by AFEG to the FEC.

50. Upon information and belief, these expenditures were funded in whole or in part by property and proceeds derived in whole or in part from the extortion of DeLay, his agents and/or others acting at DeLay's direction and on his behalf, including the Doe Defendants.

51. Upon information and belief, at the direction of DeLay, his agents and/or others acting at DeLay's direction and on his behalf, including the Doe Defendants, AFEG knowingly engaged or attempted to engage in financial transactions involving proceeds of specified unlawful activity (extortion) designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the proceeds or to avoid a transaction reporting requirement under State or Federal law, in violation of 18 U.S.C. §1956, and has engaged or attempted to engage in monetary transactions in property of a value greater than \$10,000 derived from specified unlawful activity (extortion), knowing that the property was derived from unlawful activity, in violation of 18 U.S.C. §1957.

COUNT ONE

Civil RICO -Public Official Extortion Under Hobbs Act and D.C. Code
[DeLay and Doe Defendants Only]

52. DCCC realleges and incorporates by reference paragraphs 1 through 51, above.

53. As set forth above, DeLay, in his capacity as a public official and under color of official right or authority, did personally and/or through the conduct of his agents and/or others acting at DeLay's direction and on his behalf, on a number of occasions, extort, attempt to extort, and conspire to extort political contributions and other donations of money, in or affecting interstate commerce, to the Associated Organizations and for and on behalf of the NRCC, ARMPAC and others, by obtaining, attempting to obtain, and conspiring to obtain property (political contributions) from others by wrongful use of actual or threatened use of his power as a public official and under color of official right or authority, to wit, the withholding and/or threatening to withhold favorable legislative action from individuals and other entities unless they financially supported persons and organizations associated with the enterprise or with the Republican Party, all in violation of 18 U.S.C. §1951 (the Hobbs Act) and D.C. Code §2-3851.

54. Such activity constitutes "racketeering activity" under RICO, 18 U.S.C. §1961(1).

55. DeLay is employed by or associated with an enterprise, described above, engaged in or affecting interstate commerce and has conducted or participated in the conduct, operation and/or management of the enterprise's affairs through a pattern of racketeering activity in violation of 18 U.S.C. §1962(c).

56. As a result of the aforesaid acts, DCCC has received fewer and smaller contributions from individuals, PACs and other entities than would otherwise have been received, and has been injured in its business or property.

57. As a result of the aforesaid acts, DCCC is deprived of information regarding the raising and spending of money in connection with Federal elections, thus reducing DCCC's ability to plan its activities effectively.

58. As a result of the aforesaid acts, DCCC is placed at a competitive disadvantage, conducting its activities in compliance with Federal campaign finance law binding on political party committees while the Associated Organizations conduct their competitive activities completely outside Federal campaign finance law.

59. The injuries suffered by DCCC were proximately caused by the acts of DeLay.

60. Any person injured in his business or property by reason of violations of section 1962 of RICO may recover threefold the damages sustained and the cost of the suit, including reasonable attorneys' fees. 18 U.S.C. §1964(c).

COUNT TWO
Civil RICO -Money Laundering (18 U.S.C. §1956)
[All Defendants]

61. DCCC realleges and incorporates by reference paragraphs 1 through 51, above.

62. As set forth above, DeLay, the Doe Defendants and the Associated Organizations, on a number of occasions, knowingly conducted, attempted to conduct, and conspired to conduct financial transactions, in or affecting interstate commerce, which involved proceeds of specified unlawful activity (extortion), knowing that the transactions were designed in whole or in part to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds or to avoid a transaction reporting requirement under State or Federal law.

63. The practice by DeLay, the Doe Defendants, and the Associated Organizations of repeatedly and knowingly engaging or attempting to engage in money laundering, as described above, constitutes "racketeering activity" under RICO, 18 U.S.C. §1961(1).

64. DeLay, the Doe Defendants, and the Associated Organizations are employed by or associated with an enterprise, described above, engaged in or affecting interstate commerce and have conducted or participated in the conduct, operation and/or management of the enterprise's affairs through a pattern of racketeering activity in violation of 18 U.S.C. §1962(c).

65. As a result of the aforesaid acts, DCCC has received fewer and smaller contributions from individuals, PACs and other entities than would otherwise have been received, and have been injured in its business or property.

66. As a result of the aforesaid acts, DCCC is deprived of information regarding the raising and spending of money in connection with Federal elections, thus reducing DCCC's ability to plan its activities effectively.

67. As a result of the aforesaid acts, DCCC is placed at a competitive disadvantage, conducting its activities in compliance with Federal campaign finance law binding on political party committees while the Associated Organizations conduct their competitive activities completely outside Federal campaign finance law.

68. The injuries suffered by DCCC were proximately caused by the acts of DeLay, the Doe Defendants and the Associated Organizations.

69. Any person injured in his business or property by reason of violations of section 1962 of RICO may recover threefold the damages sustained and the cost of the suit, including reasonable attorneys' fees. 18 U.S.C. §1964(c).

COUNT THREE
Civil RICO -Monetary Transactions in Illegal Proceeds (18 U.S.C. §957)
[All Defendants]

70. DCCC realleges and incorporates by reference paragraphs 1 through 51, above.

71. As set forth above, DeLay, the Doe Defendants and the Associated Organizations, on a number of occasions, engaged, attempted to engage, and conspired to engage in monetary transactions, in or affecting interstate commerce, in property derived from specified unlawful activity, namely, extortion, of a value greater than \$10,000, knowing that the property was derived from unlawful activity.

72. The practice by DeLay, the Doe Defendants, and the Associated Organizations of repeatedly and knowingly engaging or attempting to engage in monetary transactions involving criminally derived property valued at more than \$10,000, as described above, constitutes "racketeering activity" under RICO, 18 U.S.C. §1961(1).

73. DeLay, the Doe Defendants, and the Associated Organizations are employed by or associated with an enterprise, described above, engaged in or affecting interstate commerce and have conducted or participated in the conduct, operation and/or management of the enterprise's affairs through a pattern of racketeering activity in violation of 18 U.S.C. §1962(c).

74. As a result of the aforesaid acts, DCCC has received fewer and smaller contributions from individuals, PACs and other entities than would otherwise have been received, and have been injured in its business or property.

75. As a result of the aforesaid acts, DCCC is deprived of information regarding the raising and spending of money in connection with Federal elections, thus reducing DCCC's ability to plan its activities effectively.

76. As a result of the aforesaid acts, DCCC is placed at a competitive disadvantage, conducting its activities in compliance with Federal campaign finance law binding on political party committees while the Associated Organizations conduct their competitive activities completely outside Federal campaign finance law.

77. The injuries suffered by DCCC were proximately caused by the acts of DeLay, the Doe Defendants and the Associated Organizations.

78. Any person injured in his business or property by reason of violations of section 1962 of RICO may recover threefold the damages sustained and the cost of the suit, including reasonable attorneys' fees. 18 U.S.C. §1964(c).

COUNT FOUR
Civil RICO -Conspiracy (18 U.S.C. §1962(d))
[All Defendants]

79. DCCC realleges and incorporates by reference paragraphs 1 through 51, above.

80. DeLay, the Doe Defendants, and the Associated Organizations conspired to violate RICO, 18 U.S.C. §1962(c), in that they all agreed to be a part of or associated with the enterprise, described above, engaged in or affecting interstate commerce and to conduct or participate in the conduct, operation and/or management of the enterprise's affairs through a pattern of racketeering activity in violation of 18 U.S.C. §1962(c).

81. Further, DeLay, the Doe Defendants, and the Associated Organizations conspired to and agreed that DeLay, personally and/or through the conduct of his agents and/or others acting at DeLay's direction and on his behalf, would engage in repeated acts of extortion and that the Associated Organizations would launder and use or attempt to launder and use the proceeds of DeLay's extortion, as described above, all in furtherance of the unlawful scheme described above.

82. Pursuant to their agreement, DeLay did engage in repeated acts of extortion and the Associated Organizations did in fact launder and use or attempt to launder and use the proceeds of DeLay's extortion, as described above, all in furtherance of the unlawful scheme described above.

83. As a result of the aforesaid acts, DCCC has received fewer and smaller contributions from individuals, PACs and other entities than would otherwise have been received, and have been injured in its business or property.

84. As a result of the aforesaid acts, DCCC is deprived of information regarding the raising and spending of money in connection with Federal elections, thus reducing DCCC's ability to plan its activities effectively.

85. As a result of the aforesaid acts, DCCC is placed at a competitive disadvantage, conducting its activities in compliance with Federal campaign finance law binding on political party committees while the Associated Organizations conduct their competitive activities completely outside Federal campaign finance law.

86. The injuries suffered by DCCC were proximately caused by the acts of DeLay, the Doe Defendants and the Associated Organizations.

87. Any person injured in his business or property by reason of violations of section 1962 of RICO may recover threefold the damages sustained and the cost of the suit, including reasonable attorneys' fees. 18 U.S.C. §1964(c).

PRAYER FOR RELIEF

WHEREFORE, plaintiff Democratic Congressional Campaign Committee, Inc. respectfully requests that this Honorable Court:

A. Enter judgment in its favor and against defendants Tom Delay, RMIC, AFEG, USFN, and Doe Defendants 1 through 20 (collectively, "defendants") on all counts of the complaint;

B. Order the payment from defendants to plaintiff Democratic Congressional Campaign Committee, Inc. monetary damages, in an amount to be determined at trial, which shall include an amount equal to three-times the actual damages it has sustained and all costs incurred, including reasonable attorneys' fees, in bringing this action;

C. Enjoin defendants from engaging in conduct constituting further violations of the law; and

D. Grant such other and further relief as this Honorable Court deems just and reasonable.

DEMAND FOR JURY TRIAL

Plaintiff Democratic Congressional Campaign Committee, Inc. demands a trial by jury.

Respectfully submitted,

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