

IN THE UNITED STATES DISTRICT COURT FOR
THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

Candace Louise Curtis §
Rik Wayne Munson §
Private Attorneys General Plaintiffs §

vs. §

Civil Action No. _____

Candace Kunz-Freed §
Albert Vacek, Jr. §
Bernard Lyle Mathews III §
Neal Spielman §
Bradley Featherston §
Stephen A. Mendel §
Darlene Payne Smith §
Jason Ostrom §
Gregory Lester §
Jill Willard Young §
Christine Riddle Butts §
Clarinda Comstock §
Toni Biamonte §
Bobbie Bayless §
Anita Brunsting §
Amy Brunsting §
Does 1-99 §
Defendants in their individual capacities §

United States Courts
Southern District of Texas
FILED

JUL 05 2016

David J. Grady, Clerk of Court

Demand for Jury Trial

VERIFIED COMPLAINT FOR DAMAGES

1. 18 U.S.C. §1962 (c) Violations of the **Racketeer Influenced Corrupt Organization** Act involving multiple predicate acts that include both spoke and hub, and chain conspiracies.
2. 18 U.S.C. §1962 (d) Conspiracy to violate 18 U.S.C. §1962 (c)
3. 42 U.S.C. §1983 Substantive Due Process State Actor Conspiracy Against Civil Rights;
4. 42 U.S.C. §1985 Conspiracy to Deny Equal Protection of Law;
5. 18 U.S.C. §242 Conspiracy to deprive plaintiff of impartial forum;
6. Breach of Fiduciary to the Public Trust;
7. In Concert Aiding and Abetting Breach of Fiduciary both Public and Private;
8. In Concert Aiding and Abetting Misapplication of Fiduciary; and,
9. The right of claims provided at 42 U.S.C. §1988(a), 18 U.S.C. §1964 (c) and Rule 10b-5 Securities Exchange act of 1934 (17 C.F.R. §240.10b-5) and the right of private claims implied therefrom.

This lawsuit raises concerns affecting the public interest