

Federal RICO Complaint Outline

1. Introduction

This complaint outlines a pattern of criminal conduct under the Racketeer Influenced and Corrupt Organizations Act (RICO), 18 U.S.C. §§ 1961-1968.

2. Jurisdiction and Venue

Jurisdiction is proper under 28 U.S.C. § 1331 and § 1343, and 18 U.S.C. § 1964(c). Venue is proper in this district as the unlawful acts occurred here.

3. Parties

- Plaintiff: [Insert Plaintiff's Name], a resident of [City, State].
- Defendants: [List Individuals/Entities], acting under color of law or as part of a criminal enterprise.

4. The RICO Enterprise

The enterprise includes local officials (Sheriff's Dept., DA's Office), private prison contractors, and others acting in concert to carry out systemic abuse and corruption.

5. Predicate Acts

The pattern of racketeering includes:

- Kidnapping (18 U.S.C. § 1201)
- Human trafficking (18 U.S.C. § 1591)
- Obstruction of justice (18 U.S.C. § 1503)
- Embezzlement of public funds (18 U.S.C. § 666)
- Civil rights violations (42 U.S.C. § 1983)

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6. Pattern of Racketeering Activity

The acts occurred over a 10+ year period, targeting a federal family member and obstructing investigations.

These acts are continuous and related in scope.

7. Damages

Plaintiff seeks:

- Compensatory damages
- Treble damages under 18 U.S.C. § 1964(c)
- Injunctive and declaratory relief
- Attorney's fees and costs

8. Prayer for Relief

Wherefore, Plaintiff respectfully requests judgment against all Defendants as follows:

- Declaring the enterprise unlawful
- Awarding damages and costs
- Granting injunctive relief
- Ordering any other relief the Court deems just and proper.