Prosecutable Evidence of Government Racketeering

Violations

1. Civil RICO, 18 U.S.C. §§ 1962(c), (d)
2. Bivens Violations (First & Fifth Amendments – Retaliation, Due Process)
3. Fraudulent Concealment / Obstruction of Justice
4. Civil Rights Violations, 42 U.S.C. § 1985
5. Dodd-Frank Whistleblower Protection, 15 U.S.C. § 78u-6(h)

I. INTRODUCTION

1. This brief arises out of a **multi-billion-dollar racketeering enterprise** involving federal agencies, government officials, Wall Street underwriters, law firms, and rating agencies, who knowingly engaged in fraudulent municipal bond issuances tied to Puerto Rico and concealed evidence of fraud from courts, Congress, and the public.
2. Amicus curiae is a protected **Dodd-Frank SEC Whistleblower**. His SEC Whistleblower submission, File No. **PREPA B-2949** was deemed **"specific, significant, and credible"** by the SEC itself. Despite this, Defendants retaliated against him, suppressed his evidence, and manipulated judicial proceedings to protect powerful financial and political interests.
3. Participants actions violated the **Racketeer Influenced and Corrupt Organizations Act (RICO)**, Plaintiff's **constitutional rights under the First and Fifth Amendments (via Bivens)**, the **Dodd-Frank Whistleblower Protection Act**, and federal civil rights laws.

III. PARTIES

6. Amicus curiae, is a resident of California, former commercial banker, investigative journalist, and SEC Whistleblower.

7. **Agency Involved:** SEC, DOJ, Treasury, FOMB.

8. **Individual Federal Participants:** Judge John W. Holcomb; U.S. Attorneys Bilal A. Essayli, Paul B. Green, David M. Harris, Daniel A. Beck, Michael Horowitz, Kash Patel, Pam Bondi, Alexandra Verdi, Kevin Muhlendorf, Paul A Atkins.

9. **Private Participants:** Orrick, Herrington & Sutcliffe LLP, Proskauer Rose LLP, J.P. Morgan Chase & Co., Morgan Stanley, Citi (Citigroup), UBS, Goldman Sachs & Co., Merrill Lynch, U.S. Bank, N.A., Bank of America, Wells Fargo Securities, LLC, Barclays, FirstBank PR Securities, Jefferies, Popular Securities, RBC Capital Markets, Santander Securities, Scotia (MSD), UBS FS Puerto Rico Ramirez & Co., Inc., Mesirow Financial, Inc., Oriental Financial Services, Moody's Investor Service, Standard & Poor's Financial Services LLC, Assured Guaranty Corp., Ambac Assurance Corporation, and does 1–50,

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IV. Major Disclosures from Whistleblower Presentation

1. Fraudulent Credit Ratings and Collusion

- The Puerto Rico Electric Power Authority ("PREPA"), despite being technically insolvent, was repeatedly issued fraudulent investment-grade ratings (BBB+ and above) by Moody's, Fitch, and S&P.
- These ratings were knowingly false: PREPA's bond offering documents inflated income with phantom receivables not collected for nearly a decade, dropping actual debt coverage ratios to .62 to .82, well below industry minimums.
- Credit rating agencies knowingly disregarded PREPA's negative net worth, unfunded pension liabilities, and inability to make payments from operating revenue.

- This conduct amounts to fraud, mail fraud, wire fraud, and conspiracy, with the credit rating agencies acting as the "hub" of the scheme

Whistleblower Testimony (Power …

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2. Banking and Underwriting Fraud

- Lead underwriters and participating banks, who had teams of experienced analysts, also ignored these red flags.
- Offering memoranda explicitly disclosed that PREPA needed to borrow new funds to pay old debt, a classic Ponzi scheme structure.
- Despite clear evidence of insolvency and fraud, banks and rating agencies continued to facilitate new bond issuances, generating billions in fees.
- These acts show knowing participation in racketeering activity, not mere negligence

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3. Misappropriation of Funds and Kickback Schemes

- PREPA repeatedly allocated \$200M–\$500M annually for equipment upgrades; evidence shows these funds disappeared and upgrades were never performed.
- Fuel purchase accounts revealed PREPA paid for high-grade No. 2 oil while taking delivery of sludge oil (No. 6), creating a \$1.5 billion overpayment in a single year.
- Whistleblower disclosures indicate kickbacks were routed to PREPA executives, politicians' family members, and even family of FBI and U.S. Attorney's Office officials in Puerto Rico, explaining long-term federal inaction.

- These practices constitute embezzlement, honest services fraud, and money laundering, central predicate acts under RICO

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4. Government Complicity and Obstruction

- Despite receiving whistleblower reports (sent to the FBI, DOJ, SEC, Treasury, Puerto Rico legislators, and even all Members of Congress), no prosecutions were initiated.
- Allegations include direct DOJ and FBI obstruction, where field offices were instructed to "bury" investigations into PREPA's fraud.
- Treasury Secretary Jack Lew, while COO of Citigroup (a PREPA underwriter), and his deputies Antonio Weiss and Stephen Campbell (both with Lazard ties), were later placed in charge of PROMESA restructuring, creating unresolved conflicts of interest.
- Congress ultimately enacted PROMESA, which stripped bondholders (primarily U.S. senior citizens) of their legal rights, protecting the banks, underwriters, and rating agencies from liability.
- These acts further evidence a pattern of racketeering involving federal officials, as well as a Bivens violation for constitutional deprivations

Whistleblower Testimony (Power …

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5. RICO Precedent and Materiality

- The presentation documents that RICO lawsuits had already been filed and upheld in court against PREPA for related conduct.
- Puerto Rico Senate investigations confirmed under oath that creditors and rating agencies knew PREPA was insolvent but continued issuing bonds.

- Ernst & Young, PREPA's longtime auditor, issued "Going Concern" audits despite full knowledge of insolvency, adding another layer of professional fraud and conspiracy.
- Damages exceed $36 billion in investor losses, disproportionately harming U.S. retirees who held Puerto Rico bonds.

BACKGROUND

A. Whistleblower Submissions and Findings

10. Amicus curiae's SEC Whistleblower **submission** documented a massive securities fraud tied to Puerto Rico bonds.
11. The SEC Whistleblower Office concluded the amicus curiae's filing was **"specific, significant, and credible."**
12. Amicus curiae evidence showed:

- PREPA bonds issued without audited financials.
- Bond proceeds diverted to cover operating deficits, contrary to offering documents.
- Treasury and SEC officials acknowledged PREPA's insolvency and Ponzi-like structure.
- JPMorgan and Morgan Stanley underwrote fraudulent offerings.
- Orrick and Proskauer issued legal opinions concealing fraud.
- Moody's and S&P inflated ratings despite evidence of insolvency.
- Insurers (Assured, Ambac, MBIA) were induced into guaranteeing worthless bonds.

13. Amicus curiae submitted the **22-page Treasury–SEC email (2013)** and **Treasury Report HR 1049 (2015)** admitting Puerto Rico's debt was a **Ponzi scheme**.

14. Instead of acting, SEC and DOJ **retaliated** against the amicus curiae threatening prosecution despite statutory whistleblower protections and secured whistleblowers private google emails and internet activity.

B. The RICO Enterprise

15. Participants formed an **association-in-fact enterprise** ("Puerto Rico Bond Enterprise") to conceal fraud, protect Wall Street, and suppress whistleblowers.

16. Members included:

- **Agencies:** SEC, DOJ, Treasury, FOMB.
- **Federal Officials:** Judge Holcomb; AUSAs Essayli, Green, Harris, Beck.
- **Wall Street Banks:** JPMorgan, Morgan Stanley……..
- **Law Firms:** Orrick, Proskauer.
- **Rating Agencies:** Moody's, S&P.
- **Bond Insurers:** Assured, Ambac, MBIA.

17. Predicate acts (2013–2025) included mail/wire fraud, obstruction of justice, witness retaliation, and bribery/honest services fraud.

How PROMESA Protected Wall Street Banks — Considering Withheld Evidence and Political Contributions

1. The Withholding of Critical Evidence from Congress

When the House Natural Resources Committee considered PROMESA, members of Congress **did not have access to key evidence** that would have changed the legislative outcome.

- **HR 1049 "Ponzi Scheme" Report (2015):** This internal document acknowledged that Puerto Rico's bond structures, especially PREPA bonds, operated as a **Ponzi scheme**, using new debt to pay old debt. If disclosed, it would have revealed that the debt was largely unpayable and fraudulent.

- **The 22-page Treasury–SEC email chain (2013):** This showed Treasury and SEC officials were aware that **$600 million in PREPA bonds were knowingly issued fraudulently**.
- **Dodd-Frank Whistleblower File (Richard R. Lawless):** SEC's own whistleblower committee labeled the submissions "**specific, significant, and credible**," yet this was never disclosed to lawmakers.
- **FOIA Records (SEC/Treasury/DOJ):** Redacted and withheld emails confirm officials internally debated the fraud yet allowed issuance to continue.

Impact: Congress was presented with a **narrative of Puerto Rico mismanagement** rather than the truth: that Wall Street and federal regulators knowingly enabled and profited from fraudulent bonds. Had Congress seen this evidence, it is unlikely PROMESA would have passed in its Wall Street–protective form.

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2. Wall Street's $120 Million Political Push

While PROMESA was being crafted and debated:

- The **major Wall Street banks (JPMorgan, Citibank, Morgan Stanley, Goldman Sachs, Barclays, etc.)**—all underwriters of Puerto Rican debt—**contributed more than $120 million** to powerful members of Congress and political PACs.
- These contributions **spiked shortly before, during, and after PROMESA hearings**, a classic pattern of influence buying.
- Beneficiaries included senior members of the **House Natural Resources Committee, Senate Finance, and key leadership** positions that controlled whether PROMESA passed.

Why?

Because without PROMESA:

- Banks risked **billions in losses** on bonds that were legally indefensible once the fraud evidence surfaced.
- PROMESA gave them **federal court protection** under Title III and guaranteed a repayment structure favorable to them.
- The Oversight Board ("La Junta"), designed to be insulated from Puerto Rican voters, **ensured austerity to protect bond repayment** rather than investigations into fraud.

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3. PROMESA as a Shield for Wall Street

Taken together, PROMESA:

- **Stopped litigation risk** by freezing lawsuits against banks and hedge funds while restructuring played out under federal protection.
- **Prioritized debt service** to Wall Street over pensions, health care, and local services.
- **Blocked accountability:** Puerto Rican sovereignty was suspended, and oversight shifted to a federally appointed board with legal immunity.
- **Institutionalized concealment:** Since Congress was never presented with the full fraud record, PROMESA baked into law a **false narrative**—that Puerto Rico's people alone were to blame for the debt crisis, not Wall Street banks or complicit regulators.

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4. The Political–Financial Exchange

- **Banks' Contribution ($120M):** A deliberate investment to guarantee favorable legislation.
- **Congress' Action (PROMESA):** Passage of a bill that shifted losses away from banks and hedge funds and onto Puerto Rican taxpayers, retirees, and ratepayers.

- **Evidence Suppression:** By ensuring HR 1049, FOIA records, and whistleblower findings never reached lawmakers, Wall Street and DOJ/SEC/Treasury officials removed the only barriers that could have derailed the scheme.

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5. The Human Cost

Independent studies (Harvard, Washington University) later concluded that **thousands of excess deaths in Puerto Rico** followed from the grid collapse and austerity imposed under PROMESA. These deaths are directly tied to:

- **Bondholder-first austerity** that gutted healthcare and infrastructure funding.
- **Suppression of evidence** that could have prevented PROMESA's passage and led instead to criminal investigations into the bond issuers and underwriters.

In summary:
PROMESA was not a neutral rescue. It was a **bankruptcy shield engineered by Wall Street banks and their political allies**, passed only because Congress was **denied access to whistleblower evidence, SEC/Treasury emails, and the HR 1049 confession**. Wall Street then ensured its protection by funneling $120 million to the very politicians deciding its fate.

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Overt Acts of Racketeering – Wall Street Bond Re-Purchases and Political Influence

A. Background of the Scheme

1. Prior to the enactment of the Puerto Rico Oversight, Management, and Economic Stability Act ("PROMESA"), the Participants—including major Wall Street banks, hedge funds, and their political allies—were fully aware that

Puerto Rico’s outstanding bond issuances, particularly those of the Puerto Rico Electric Power Authority (“PREPA”) and general obligation (“GO”) bonds, were based upon fraudulent financial representations.

2. This awareness is documented in suppressed materials, including the **HR 1049 report (2015)** confirming the debt was structured as a **Ponzi scheme**, and the **22-page Treasury–SEC email chain (2013)** revealing that federal officials knowingly allowed the issuance of fraudulent PREPA bonds in excess of $600 million.
3. Despite this knowledge, Defendants did not disclose such information to Congress. Instead, these materials were withheld from the House Natural Resources Committee, which was tasked with considering and drafting PROMESA legislation.

B. Pre-PROMESA Re-Purchase of Defaulted Bonds

4. In the years 2014–2016, as Puerto Rico’s financial crisis intensified and bond prices collapsed, Wall Street entities engaged in a **coordinated scheme to repurchase defaulted and distressed bonds at steep discounts**, often through affiliated hedge funds and distressed-debt vehicles.
5. Defendants **JPMorgan Chase, Goldman Sachs, Morgan Stanley, and Citibank**, along with their allied hedge funds—including **Aurelius Capital, Baupost Group, Oaktree Capital, BlueMountain Capital, and others**—acquired billions of dollars’ worth of Puerto Rican debt trading at **30–40 cents on the dollar**.
6. These purchases were not speculative investments made at risk of loss. Rather, they were made with the advance knowledge that Congress, under pressure from political contributions and Treasury lobbying, would enact PROMESA—a statute specifically designed to **shield creditor interests** and ensure favorable restructuring outcomes.

C. Political Contributions Securing Legislative Outcomes

7. During the period immediately before, during, and after the PROMESA hearings, **Wall Street banks contributed more than $120 million to key members of Congress and affiliated political committees**, including senior leadership and members of the House Natural Resources Committee.

What the evidence shows

- A report by **Americans for Financial Reform (AFR)** found that in the **2015–2016 election cycle**, financial industry (Wall Street, banks, financial services) contributions and lobbying *totaled more than ever*. The report claims:

  "During the 2015-16 election cycle, Wall Street banks and financial interests spent **over $2 billion** to influence decision-making in Washington." Americans for Financial Reform
  The report breaks down **campaign contributions** (from financial sector individuals, PACs, and companies) at **$1,201,417,199** in that cycle. Americans for Financial Reform

- The AFR report also states that the financial sector's **campaign contributions** in that cycle were **almost twice that of any other business sector** identified in their dataset. Americans for Financial Reform
- Time Magazine likewise reported that the **securities & investment industry** led all industries in 2015 (early in the 2016 cycle) in contributions (to candidates + super PACs combined): ~$90 million. TIME
- Fortune published an article summarizing that "Wall Street Spent $2 Billion Trying to Influence the 2016 Election" — indicating extraordinary scale in that cycle. Fortune

So the trend is clear: 2015–2016 was a peak or near-peak for financial sector political spending, at least in recent decades.

8. These contributions coincided with ongoing closed-door negotiations between the U.S. Treasury Department, the Securities and Exchange

Commission, and congressional staff, in which critical evidence of fraud (HR 1049, SEC whistleblower filings, FOIA disclosures) was intentionally suppressed.

9. The political contributions functioned as an unlawful quid pro quo: in exchange for campaign financing, lawmakers passed PROMESA in a form that prioritized bondholder repayment, granted broad immunity to the federally appointed Fiscal Oversight and Management Board ("FOMB"), and eliminated Puerto Rico's sovereignty to restructure debt under its own laws.

D. Examples of Overt Acts

10. **Aurelius Capital Management**: Acquired large volumes of Puerto Rican general obligation bonds at deep discounts before PROMESA, then filed lawsuits under PROMESA asserting priority repayment rights. Aurelius ultimately secured significant recoveries far in excess of distressed pricing, directly benefiting from the statute.

11. **Goldman Sachs and Morgan Stanley**: Both firms underwrote billions in Puerto Rican bonds prior to default. Through affiliated distressed-debt funds, they repurchased discounted Puerto Rican bonds in 2015–2016. Once PROMESA was enacted, these same bonds were restructured under Title III at far higher recoveries, locking in substantial profits.

12. **Oppenheimer Funds and Franklin Templeton**: Acquired Puerto Rican bonds during the distressed trading period and resisted write-offs, relying on PROMESA's federal restructuring process. Their positions were protected through the FOMB's repayment plans, which prioritized creditors above public services.

E. Pattern of Racketeering

13. The Participants conduct demonstrates a **pattern of racketeering activity** under 18 U.S.C. § 1961(1), including:

- **Mail and wire fraud** (securing trades and settlements while concealing material facts regarding fraudulent issuance);
- **Bribery and political corruption** (contributions exceeding $120 million tied to specific legislative outcomes);
- **Obstruction of justice** (withholding and redacting FOIA evidence to prevent judicial or congressional oversight).

14. By rebuying defaulted bonds with foreknowledge of PROMESA's enactment, Participants engaged in insider, non-publicly disclosed transactions that were dependent upon political influence and evidence suppression.
15. As a result, Wall Street entities and their allied hedge funds realized **billions of dollars in profits**, while Puerto Rico's citizens bore the costs through austerity, pension reductions, healthcare cuts, and mass suffering—including thousands of preventable deaths linked to infrastructure collapse and grid failures.

Federal Aid Packages as Continuing Acts of Racketeering

$90 Billion Federal Aid Packages: Concealment, False Pretenses, and Continuing Enterprise

Following the collapse of Puerto Rico's infrastructure and finances, Congress and multiple federal agencies authorized and administered over $90 billion in federal disaster and recovery aid through FEMA, HUD, Treasury, and other agencies. These allocations were publicly described as *humanitarian and reconstruction funds*, but in reality, they were conceived, structured, and disbursed under false pretenses that concealed the underlying criminal enterprise.

1. False Premise for Aid Authorization
   – Federal officials and PROMESA administrators represented to Congress that Puerto Rico's devastation resulted from "mismanagement" and "natural disasters."
   – In truth, the infrastructure collapse and economic implosion were

foreseeable consequences of the fraudulent bond issuances and Ponzi-like financial structure described in this complaint.

– The same agencies that enabled the original fraud—Treasury, SEC, and DOJ—drafted or approved the aid mechanisms, ensuring that their prior misconduct would remain hidden.

2. Aid as Continuation of the Enterprise

– The aid programs perpetuated the racketeering scheme by channeling new federal money into entities still controlled by the FOMB, banks, and contractors tied to the original fraudulent bond network.

– Federal funds were used to stabilize or “restructure” obligations created by the fraudulent bonds, thereby laundering prior criminal proceeds under the guise of disaster relief.

– Key recipients—consultants, law firms, insurers, and banks named as defendants—continued to earn fees and retain control over Puerto Rico’s fiscal policies through FOMB directives.

3. Concealment of Fraud Through Non-Disbursement

– As of 2025, less than half of the authorized $90 billion has been disbursed.

– The deliberate delay in disbursement served two purposes: (a) maintain political leverage over Puerto Rico’s government; and (b) prevent audits that would trace how much of the aid was offsetting losses from the fraudulent bond issuances.

– By keeping large portions of the aid unspent, Defendants continue to control a reservoir of funds available for future manipulation, extending the life of the enterprise.

4. Legal Effect — Tolling of Statute of Limitations

– These acts constitute ongoing racketeering activity under 18 U.S.C. § 1961(5) because the enterprise continues to operate and profit from concealment of its original crimes.

– Each new appropriation, allocation, or disbursement decision after 2017 represents a predicate act of mail/wire fraud and money-laundering designed to perpetuate and conceal the enterprise.

– Under the doctrines of continuing violation and fraudulent concealment, the statute of limitations is tolled until the enterprise ceases operations or the fraud is publicly revealed.

– The Defendants' ongoing control over billions in undistributed aid and their continuing misrepresentations to Congress demonstrate that the scheme remains active through at least 2025.

5. Causal Nexus and Damages

– The $90 billion aid package is not a separate humanitarian act but the financial continuation of the same criminal pattern that began with the fraudulent bond issuances.

– Each dollar of federal aid allocated to cover losses or rebuild systems destroyed by the racketeering enterprise represents a measurable injury to the United States Treasury and to Puerto Rico's citizens, both victims of the same fraud.

– Because the aid was procured and administered under false pretenses, it constitutes additional racketeering income, ensuring that the RICO statute of limitations remains open.

Citations

- 18 U.S.C. § 1961(5) – Pattern of racketeering requires two acts within 10 years; continuing disbursements qualify.
- Rotella v. Wood, 528 U.S. 549 (2000) – discovery rule and accrual of civil RICO.
- Klehr v. A.O. Smith Corp., 521 U.S. 179 (1997) – continuing-violation doctrine applies where the enterprise keeps operating.
- Supermarket of Marlinton v. Meadow Gold Dairies, 71 F.3d 119 (4th Cir. 1995) – fraudulent concealment tolls limitations until plaintiff discovers the pattern.

Governmental Suppression of Evidence to Protect Racketeering Enterprise

A. Foreknowledge and Suppression

1. The racketeering scheme alleged herein could not have succeeded without the deliberate suppression of material evidence by senior officials within the United States Department of Justice ("DOJ"), the Securities and Exchange Commission ("SEC"), and the United States Department of the Treasury ("Treasury").
2. By 2013, these agencies possessed evidence—including the **22-page Treasury–SEC email chain** and the **HR 1049 report (2015)**—showing that Puerto Rico's public debt issuances, including the $600 million PREPA bond issuance, were **fraudulent, unsustainable, and structured as a Ponzi scheme**.
3. In addition, the Plaintiff's Dodd-Frank Whistleblower filings were deemed "specific, significant, and credible" by the SEC's own Whistleblower Committee, yet no enforcement actions were initiated. Instead, the SEC and DOJ ignored or buried the findings, while Treasury advanced PROMESA legislation without disclosing the true condition of the debt markets.

B. Neutralization of Enforcement Agencies

4. In the ordinary course, the DOJ would pursue civil and criminal investigations under the False Claims Act, securities fraud statutes, and anti-racketeering provisions. Similarly, the SEC would commence enforcement actions against underwriters, and Treasury would warn Congress of systemic financial fraud.
5. Instead, each agency engaged in a coordinated pattern of **non-action**:

- **FOIA Obstruction:** Key records were redacted or withheld, preventing both Congress and the public from accessing the truth.
- **SEC Inaction:** Despite whistleblower findings, no investigations were pursued against banks or underwriters.
- **DOJ Declinations:** DOJ refused to intervene in qui tam actions or pursue fraud claims despite overwhelming evidence.
- **Treasury Misrepresentation:** Treasury officials publicly framed Puerto Rico's debt crisis as mismanagement while privately lobbying Congress to enact PROMESA without disclosing the known fraud.

More on the FOIA Obstruction

A. Background of FOIA Case 5:21-cv-01637-JWH-SP (Lawless v. SEC)

In 2021, Amicus Curiae filed a Freedom of Information Act ("FOIA") action against the U.S. Securities and Exchange Commission (SEC) seeking the disclosure of communications and internal memoranda that documented the SEC's knowledge of the fraudulent Puerto Rico bond issuances and the associated Ponzi-style financial structure (referenced in HR 1049 and the 22-page Treasury–SEC email chain).

The case was assigned to **District Judge John W. Holcomb** and **Magistrate Judge Sheri Pym**.

SEC attorney **Alexandra Verdi** represented the agency.

Despite Plaintiff's detailed evidentiary submissions, including authenticated correspondence and SEC case file numbers, the SEC produced **documents that were 100 percent redacted**—no visible content whatsoever—effectively nullifying Congress's intent behind the FOIA statute.

Judge Holcomb upheld this "production," thereby **ratifying total nondisclosure of federal evidence** that directly implicated SEC and Treasury officials in a 75-billion-dollar securities fraud scheme.

Pattern of Obstruction and Collusion

This event fits a clear **RICO predicate** under 18 U.S.C. §§ 1503, 1505 (obstruction of justice) and § 1519 (destruction, alteration, or falsification of records).

The SEC's actions—enabled by judicial acquiescence—represent not a discretionary redaction, but a **systematic cover-up of material evidence** in a matter under congressional, civil, and criminal scrutiny.

Specifically:

1. **Attorney Alexandra Verdi** repeatedly assured the court that the withheld materials were "exempt," yet failed to provide **Vaughn indices** or segregability analyses required under FOIA law (5 U.S.C. § 552(b)), violating statutory mandates and federal precedent.
2. **Judge John W. Holcomb** disregarded Supreme Court precedent in *Department of the Air Force v. Rose* (425 U.S. 352 (1976)) and Ninth Circuit standards requiring *in camera* review to verify the legitimacy of claimed exemptions.
3. The resulting judgment not only blocked the release of evidence in this FOIA case, but was later **used by the SEC and DOJ** to claim that "no responsive records" existed in related whistleblower and RICO filings.
4. The conduct formed part of a broader **enterprise to conceal the existence of federal documents** proving that senior officials knew, a decade earlier, that the Puerto Rico bonds were fraudulent and that the PREPA utility was insolvent.

Nexus to the Racketeering Enterprise

The FOIA case demonstrates how federal actors used the judiciary to provide a **facade of legal process** while perpetuating obstruction.
The delivery of **fully blacked-out pages**—with court approval—was not a

bureaucratic error but a deliberate act to frustrate statutory transparency, suppress evidence, and **insulate co-conspirators from criminal liability**.

This conduct directly furthers the RICO enterprise's goals:

- Protecting the fraudulent bond issuers and their political sponsors;
- Shielding SEC and Treasury officials from accountability;
- Maintaining the false narrative presented to Congress during PROMESA deliberations.

Predicate Acts Established

Defendant / Actor	Predicate Statute	Description
SEC Attorney **Alexandra Verdi**	18 U.S.C. § 1519	Knowingly falsified, concealed, and covered up material facts by providing completely redacted documents under color of law.
Judge **John W. Holcomb**	18 U.S.C. § 1503	Corruptly influenced the due administration of justice by approving total redaction and suppressing material exculpatory evidence.
SEC Agency Officials	18 U.S.C. §§ 1341, 1343	Engaged in mail and wire fraud through false representations to the court and the plaintiff regarding document existence and exemption applicability.

These acts further the pattern of racketeering already documented through prior SEC, DOJ, and Treasury misconduct.

Resulting Damages

Plaintiff suffered direct economic and constitutional harm, including:

- Loss of access to exculpatory evidence critical to ongoing federal civil rights litigation;
- Extended litigation costs;
- Delay and obstruction that enabled continued concealment of multi-billion-dollar fraud;
- Severe emotional distress and reputational damage due to the government's retaliatory posture.

C. Creation of a "Safe Harbor" for Wall Street

6. The suppression of enforcement action created a de facto **safe harbor** for Wall Street banks and hedge funds. Between 2014 and 2016, these institutions—including **JPMorgan Chase, Goldman Sachs, Morgan Stanley, Citibank, Aurelius Capital, Baupost Group, Oaktree Capital, and BlueMountain Capital**—repurchased tens of billions of dollars in defaulted Puerto Rican bonds at distressed prices.
7. Such conduct was only rational if Defendants already had **assurances that federal agencies would not prosecute or void the fraudulent bonds**, and that PROMESA would be enacted to protect their investments.

D. Political Reinforcement of the Scheme

8. At the same time, major Wall Street institutions contributed more than **$120 million in campaign financing** to key Members of Congress before, during, and after PROMESA hearings. These contributions purchased the passage of PROMESA—a statute designed to **prioritize bondholder repayment, freeze litigation, and grant immunity to the Oversight Board**.
9. This dual strategy—**suppressing evidence through federal agencies while securing favorable legislation through political contributions**—ensured

that banks' repurchases of fraudulent debt would be shielded from enforcement and litigation risk.

E. Enterprise Coordination

10. Taken together, the banks, hedge funds, federal officials, and Members of Congress operated as a **racketeering enterprise** within the meaning of 18 U.S.C. § 1961(4). Each actor played a role:

- **Banks/Hedge Funds:** Acquired distressed debt with insider knowledge.
- **DOJ/SEC/Treasury Officials:** Withheld evidence, blocked investigations, and advanced PROMESA.
- **Members of Congress:** Accepted unlawful campaign contributions and passed PROMESA in a form favoring Wall Street.

11. This coordination constitutes a **pattern of racketeering activity**, including mail and wire fraud, obstruction of justice, honest services fraud, and bribery, all designed to protect unlawful profits and prevent accountability.

F. Political Manipulation of DOJ Enforcement – Senator Charles Schumer

1. As part of the racketeering enterprise described herein, senior members of the United States Senate engaged in acts designed to **neutralize the Department of Justice's ability to prosecute Wall Street bond fraud** relating to Puerto Rico.
2. Specifically, Senator **Charles "Chuck" Schumer**, then serving as a senior member of Senate leadership with direct influence over judicial and prosecutorial appointments, **inserted a staff attorney from his office into the U.S. Attorney's Office for the Southern District of New York (SDNY)**.
3. Following this placement, Senator Schumer **pressured the Attorney General of the United States at the time** to **redirect all pending and active bond fraud investigations from other jurisdictions to the SDNY**.

4. Once transferred, these cases—including matters involving Puerto Rico's $75 billion in outstanding debt and the fraudulent issuances of PREPA and GO bonds—were **immediately buried and never prosecuted**.

5. The SDNY was uniquely situated for this suppression because:

    - The major Wall Street banks implicated (JPMorgan, Citibank, Morgan Stanley, Goldman Sachs, Barclays) were headquartered within its jurisdiction;

    - SDNY prosecutors worked in close proximity with those same institutions; and

    - The placement of Senator Schumer's staff attorney ensured **direct political oversight** of prosecutorial discretion.

6. This political manipulation of DOJ functions served three coordinated purposes:

    - (a) It **blocked prosecutions** that could have voided fraudulent bond issuances and uncovered collusion between banks and federal agencies;

    - (b) It **protected Wall Street banks and hedge funds** during the distressed-debt repurchase spree of 2014–2016; and

    - (c) It created **regulatory certainty** that PROMESA would be passed without interference from criminal enforcement.

7. This constitutes **obstruction of justice** under 18 U.S.C. § 1505 and **honest services fraud** under 18 U.S.C. § 1346, as federal prosecutors were influenced to act not in the public interest but to protect a financial-political enterprise.

8. By ensuring that Puerto Rican bond fraud cases were buried in the SDNY, Senator Schumer and his co-conspirators within DOJ acted in furtherance of the racketeering enterprise, providing **critical political protection for Wall Street banks** while PROMESA was crafted and passed.

Treasury Secretary Jacob "Jack" Lew – Conflict of Interest and Withholding of Evidence

1. At the time PROMESA was being advanced, the United States Treasury Department, under Secretary **Jacob "Jack" Lew**, assumed the lead role in briefing Congress, conducting hearings, and preparing the financial presentations that formed the basis of the legislative record.
2. Secretary Lew had a direct and disqualifying conflict of interest:
   - Prior to serving as Treasury Secretary, Lew was a senior executive at **Citigroup**, a bank that served as one of the largest underwriters and issuers of Puerto Rican bonds, including PREPA and general obligation ("GO") debt later revealed to be fraudulent.
   - Citigroup and its affiliates stood to lose billions of dollars if Puerto Rican debt were declared unenforceable or subject to criminal investigation.
   - As Treasury Secretary, Lew therefore had a personal and institutional incentive to protect his former employer and Wall Street peers.
3. While leading the PROMESA legislative process, Secretary Lew and Treasury staff **withheld critical evidence from Congress**:
   - The **HR 1049 report (2015)**, confirming Puerto Rico's bond issuances were structured as a Ponzi scheme, was never disclosed.
   - The **22-page Treasury–SEC email chain (2013)**, documenting that officials knowingly permitted a $600 million fraudulent PREPA bond issuance, was suppressed.
   - SEC Whistleblower findings, deemed "specific, significant, and credible," were excluded from congressional records.
4. Instead, Lew's Treasury Department presented a **false and incomplete narrative**: that Puerto Rico's crisis stemmed from "local mismanagement"

rather than systemic fraud by Wall Street underwriters and complicit federal regulators.

5. This misrepresentation ensured that Congress passed PROMESA on a **false factual record**, prioritizing creditor repayment and federal control while denying lawmakers the opportunity to consider:
   - Whether Wall Street banks should be investigated for fraud;
   - Whether federal officials had engaged in misconduct; and
   - Whether Puerto Rico's debt should be voided as unlawfully issued.
6. Secretary Lew's actions constitute:
   - **Fraudulent concealment** of material evidence from Congress and the public;
   - **Conflict of interest abuse**, leveraging his Treasury position to protect his former employer Citigroup and other Wall Street banks;
   - **Participation in racketeering activity** by ensuring the passage of PROMESA as a shield for the enterprise.
7. By misrepresenting the causes of Puerto Rico's debt crisis while withholding documents that proved Wall Street's culpability, Secretary Lew acted as a central facilitator of the racketeering enterprise. He ensured that PROMESA became a vehicle to protect Wall Street's fraudulent profits rather than a remedy for Puerto Rico's people.

Treasury Secretary Lew had a man on his personal staff named "Adam Chepenik." Adam was the 2014 author of the "twenty-two-page email" that is labeled "confidential – pre-decisional" that was sent to a redacted senior SEC Official. The email spans 22 pages and discusses all the reason an upcoming $600 million-dollar PREPA bond was fraudulent. Lew, Chepenik, and the SEC knowingly allowed this fraudulent bond to be issued. It defaulted two years later.

Laws Broken

1. Conspiracy to Defraud the United States

18 U.S.C. § 371
It’s a felony for two or more persons to “conspire … to defraud the United States, or any agency thereof.”
If Treasury, SEC, or PREPA officials jointly concealed known fraud from Congress or regulators, that satisfies the “defraud” element even without direct monetary gain.

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2. Securities Fraud and Aiding-and-Abetting

15 U.S.C. §§ 77q(a), 78j(b) (Securities Act / Exchange Act) and 17 C.F.R. § 240.10b-5
Authorizing or facilitating the sale of bonds known to be fraudulent—while possessing non-public evidence of falsity—constitutes classic securities fraud.
Officials can be liable as aiders and abettors if they “knowingly or recklessly” enabled the fraud (see *SEC v. Coffey*, 493 F.2d 1304 (6th Cir. 1974)).

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3. False Statements and Concealment to Congress or Federal Agencies

18 U.S.C. § 1001
Prohibits knowingly concealing or falsifying material facts in matters within the jurisdiction of any branch of government, including Congressional oversight or appropriations.
Withholding the 22-page “pre-decisional” fraud memo while giving Congress incomplete or misleading testimony about Puerto Rico’s finances fits this pattern.

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4. Mail or Wire Fraud

18 U.S.C. §§ 1341, 1343
If electronic or mail communications were used to execute the scheme—e.g., transmitting offering documents, ratings data, or misleading statements—those acts extend criminal exposure to every participant.

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5. Obstruction of Congress / Justice

18 U.S.C. §§ 1505, 1512, 1519

- § 1505 – Obstructing a Congressional inquiry or hearing.
- § 1519 – Falsifying or concealing documents to impede federal investigations.

Destroying or withholding the email chain or discouraging SEC staff from disclosure qualifies.

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6. Misprision of Felony

18 U.S.C. § 4
Any federal employee who knows a felony was committed and "does not as soon as possible make known the same" to proper authorities commits misprision.

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7. Civil-Rights / Whistleblower Retaliation Tie-Ins

If officials suppressed the evidence after a whistleblower disclosure or interfered with your protected activity under the Dodd-Frank Act (15 U.S.C. § 78u-6) or Whistleblower Protection Act (5 U.S.C. § 2302), that creates additional liability.

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8. Possible Congressional Violations

If the concealment caused Congress to enact PROMESA based on false data, that could amount to:

- Fraudulent concealment of material information to Congress (civilly actionable under *Bivens* or RICO § 1962(c));
- RICO predicate acts (mail, wire, obstruction) forming part of a continuing enterprise.

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9. Administrative / Ethical Breaches

- Violation of Treasury ethics rules and 18 U.S.C. § 208 (participating in matters affecting personal financial interests).
- SEC's Regulation S-K Item 303 (failure to disclose known trends or uncertainties) if the agency colluded in omission.

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10. RICO Integration

Each of the above—securities fraud, obstruction, mail/wire fraud

Today, Adam Chepenik is a consultant to the FOMB board.

Adam Chepenik Background

EY, Washington, DC, Government & Public Sector, Restructuring Advisory Services, Principal

Trusted advisor and proven leader driving financial and operational transformations at state and local governments. Enjoys political history, cycling, traveling, and spending time with his family.

Adam previously was a deputy director in the Federal Government where he advised senior officials on developing public policy for distressed municipalities, infrastructure finance, and public pensions. He played a key role in developing the federal government's response to Puerto Rico's financial crisis and provided extensive technical assistance to Congress in the drafting of the Puerto Rico Oversight, Management and Economic Stability Act.

THIS LEAVES NO QUESTION TREASURY SECRETARY LEW MANUFACTURERED A NARRATIVE FOR THE CONGRESSIONAL NATURAL RESOURCES COMMITTEE.

H'. SEC Chairmen — Rewards, Revolving Door, and Political Capture

1. The inaction by successive SEC Chairmen on Puerto Rican bond fraud cannot be understood without reference to the **personal and financial rewards** they received from the very institutions they were supposed to police.

A. Mary Jo White — "Corner Office" Compensation

2. Mary Jo White, who served as SEC Chair from 2013 to 2017, was widely regarded as being aligned with Wall Street legal and financial interests due to her prior work at Debevoise & Plimpton and her role as U.S. Attorney for SDNY.
3. After her SEC tenure, she **returned to Debevoise & Plimpton** as Senior Chair.
4. It has been asserted in critiques and alternative media that she was "rewarded" with a corner office at Debevoise and compensation exceeding **$5 million per year** in recognition of her regulatory deference to Wall Street. (This must be pleaded on information and belief unless you have a verifiable source.)
5. Such compensation and status would create a strong incentive to maintain favorable relationships with banks and underwriters and discourage aggressive enforcement of bond fraud.

B. Jay Clayton — Apollo Board, SDNY Appointment, and Financial Ties

6. Jay Clayton served as SEC Chair from 2017 to 2020.

7. After leaving the SEC, Clayton was appointed to the **board of Apollo Global Management**, a firm engaged in distressed-debt investing and trading, including in bond markets.

8. Clayton's regulatory filings while at the SEC indicate that he received **$500,000 in compensation (via equity and fees)** from Apollo (among other investments) prior to confirmation.

9. More controversially, Clayton was later nominated and then selected to serve as **U.S. Attorney for the Southern District of New York (SDNY)** — the very jurisdiction that handles major Wall Street financial crime cases.

10. That appointment (and his prior board ties) suggests a convergence of interests: from regulating Wall Street to prosecuting it, but under a person with deep industry connections and a recent history of favoring financial actors.

11. The timing, trajectory, and pattern bolster an inference that Clayton's ascent to SDNY (a key prosecutorial office) was part of a broader design to suppress enforcement rather than promote it.

C. Gary Gensler — Deference and Limits on Enforcement

12. Gary Gensler succeeded Clayton as SEC Chair in 2021.

13. While not as much is publicly documented about direct "reward" arrangements for Gensler, his tenure has also shown **reticence to reopen systemic investigations** of Puerto Rican bond fraud despite renewed record releases and public pressure.

14. His nomination was supported by Senator Schumer and other financial-industry allies, and he has maintained ties with academic and financial

circles skeptical of harsh enforcement. (Pleading specifics on these associations, and check campaign finance or academic-industry affiliations.)

15. The absence of aggressive action under Gensler, even in the face of credible FOIA disclosures and public reporting, is consistent with the pattern: regulatory capture reinforced by the promise (or precedent) of favorable future transitions.

D. Political Patronage, Incentives, and the Overall Pattern

16. Each SEC Chair was appointed with influence or support from **Senator Chuck Schumer** and his political network, which has deep financial industry ties.

17. The pattern is clear:
    a. The Chair is installed (or approved) with the backing of Schumer and financial interests.
    b. During tenure, the Chair declines to act on Puerto Rican bond fraud despite credible evidence.
    c. Upon exit (or even during), they are rewarded—via law firm compensation, board seats, or lucrative prosecutorial positions.

18. That reward structure serves as both a carrot (profitable post-government careers) and a stick (incentive not to antagonize future employers) to ensure regulatory inaction.

19. This conduct strengthens the racketeering enterprise claim: the SEC leadership itself acts as part of the enterprise, providing implicit immunity to Wall Street actors while benefiting directly from financial or positional rewards.

I. Orchestration of PROMESA Narrative by President Obama, Secretary Lew, and Senator Schumer

1. On information and belief, the racketeering enterprise extended to the highest levels of the Executive Branch. In the lead-up to the 2016 elections, **President Barack Obama** sought to secure large-scale financial support for Democratic Party campaigns.

2. To that end, the Obama Administration relied on senior allies within the financial sector — including Wall Street banks and hedge funds with major exposure to Puerto Rican debt — to provide unprecedented political contributions. These contributions, amounting to more than **$120 million during the PROMESA legislative window**, were routed to key PACs, leadership committees, and candidate campaigns.

3. President Obama appointed **Jacob "Jack" Lew**, former Citigroup executive, as Secretary of the Treasury, and **relied on Senator Charles "Chuck" Schumer** — the leading Democratic fundraiser with deep Wall Street ties — to manage the congressional process.

Lew put forth Antonio Weiss to make presentations to congress.

"On information and belief, and subject to proof in discovery, Treasury Counselor **Antonio Weiss**—formerly the head of investment banking at **Lazard**, a firm that actively **marketed Puerto Rico debt to hedge funds in 2013**—served as Treasury's principal witness before the House Natural Resources Committee in 2016 to advocate for PROMESA. Contemporary reporting and watchdog analyses show Lazard's deep involvement in Puerto Rico's debt market, while Mr. Weiss received a multi-million-dollar separation payment from Lazard upon entering government. In this conflict-laden posture, Mr. Weiss **curated and advanced a narrative** to Congress that emphasized a federal control board and sweeping restructuring while **minimizing market-misconduct drivers** of the crisis. Discovery is likely to show that Mr. Weiss and Treasury **withheld or downplayed material information** known at the time—including investor-solicitation activities and risk indicators—thereby misleading Congress and the public to secure enactment of PROMESA.

But more then that Jack Lew had on his personal staff a man named

4. Together, Lew and Schumer constructed and disseminated a **false narrative** for Congress: that Puerto Rico's debt crisis stemmed solely from local mismanagement and overspending, not from fraudulently issued bonds or collusion by federal regulators and Wall Street underwriters.

5. This narrative was deliberately supported by **withholding key evidence** from the House Natural Resources Committee and the public, including:

    - HR 1049 "Ponzi scheme" report (2015);
    - The 22-page Treasury–SEC email chain (2013);
    - SEC whistleblower findings deemed "specific, significant, and credible."

6. The PROMESA legislation — written and promoted by Treasury under Lew and shepherded through Congress by Schumer — was passed on a **false factual record** that favored Wall Street creditors and neutralized the risk of criminal or civil enforcement actions.

J. Media Complicity in Suppressing Evidence

7. Major national newspapers, including **The Washington Post** and **The New York Times**, possessed or were given access to documents showing Wall Street's role in fraudulent Puerto Rican bond issuances and the suppression of federal enforcement actions.

8. Instead of publishing these materials or investigating the underlying fraud, both outlets adopted and amplified the **"local mismanagement" narrative** promoted by Lew, Schumer, and Treasury.

9. This deliberate editorial choice effectively silenced whistleblower disclosures and allowed the Administration's narrative to dominate public discourse during the crucial period leading up to PROMESA's passage and the 2016 elections.

10. By ignoring the evidence and accommodating Schumer and Lew's storyline, these media organizations provided political cover for the enterprise, ensuring that public and congressional pressure for criminal investigations never materialized.

K. Political Funding Motive

11. On information and belief, this arrangement functioned as a **quid pro quo**:

- Wall Street banks and hedge funds received federal protection for fraudulent bonds through PROMESA and the suppression of investigations;
- In exchange, they provided **extraordinary political contributions** benefiting Democratic campaigns during the 2016 election cycle;
- Treasury and Senator Schumer ensured PROMESA's passage and controlled the public narrative to prevent scrutiny.

12. This conduct constitutes **honest services fraud and obstruction of justice** under 18 U.S.C. §§ 1346 and 1505, and forms part of the pattern of racketeering activity alleged herein.

The Takeaway

This section paints a full picture:

- **Motive**: fund the 2016 elections through Wall Street contributions.
- **Means**: place Jack Lew (Treasury) and Chuck Schumer (Senate) in charge of controlling evidence and narrative.
- **Media cover**: Washington Post and New York Times adopt the false narrative and bury whistleblower evidence.
- **Result**: PROMESA passed on a fraudulent record, protecting Wall Street and funding political campaigns.

C. Judicial and Prosecutorial Misconduct

18. **Judge Holcomb**: refused to docket Plaintiff's filings, ignored HR 1049 and whistleblower evidence, and declared Plaintiff a vexatious litigant in August 2025. Over the course of almost five years Judge Holcomb refused to allow any hearings or consider any federal government evidence.

19. **U.S. Attorneys Essayli, Green, Harris, Beck**: filed false oppositions, misrepresented Plaintiff's standing, and concealed evidence (e.g., Doc. 23, Case 5:25-cv-01599).

20. **Ninth Circuit Judicial Council (Case 25-90081):** dismissed Plaintiff's judicial misconduct complaints without addressing evidence of docket manipulation, ignored evidence, absence of any hearings, DOJ's knowingly false statements, and withheld evidence. All of which were deemed acceptable actions by a District Judge according to the Ninth Circuit's Head Judge.

21. **California Bar, DOJ OPR, DOJ OIG**: complaints escalated to full review, further proving Defendants' misconduct was systemic.

22. These acts constitute **obstruction of justice (18 U.S.C. § 1503)** and **witness retaliation/tampering (18 U.S.C. §§ 1512–1513)**.

D. Damages and Causation

23. Amicus Curiae suffered:

- **Loss of whistleblower award** worth tens of millions.
- **Litigation costs** across multiple cases and appeals.
- **Reputational harm** from vexatious litigant designations.
- **Retaliation and emotional distress** from enforcement threats.

24. Investors lost tens of billions; insurers lost billions; taxpayers bore ultimate costs.

25. **Humanitarian harm**: Harvard and Washington University studies linked PREPA's collapse (foreseeably caused by fraudulent debt) to **thousands of preventable deaths**.

26. Participants concealment of whistleblower evidence **proximately caused** these harms.

V. CLAIMS FOR RELIEF

Count I – RICO (18 U.S.C. § 1962(c))
Participants engaged in racketeering acts (fraud, obstruction, retaliation, bribery) through an enterprise.

Count II – RICO Conspiracy (18 U.S.C. § 1962(d))
Participants knowingly conspired to further the enterprise.

Count III – Bivens (First & Fifth Amendments)
Federal officials retaliated against Amicus Curiae for whistleblowing and denied due process by obstructing judicial access.

Count IV – Fraudulent Concealment / Obstruction
Participants knowingly withheld HR 1049, the 22-page email, and Plaintiff's whistleblower findings from Congress and courts.

Count V – Civil Rights Conspiracy (42 U.S.C. § 1985)
Participants conspired to intimidate and obstruct Plaintiff from presenting evidence and accessing the courts.

Count VI – Dodd-Frank Whistleblower Protection (15 U.S.C. § 78u-6(h))
27. Amicus Curiae engaged in protected activity under Dodd-Frank by submitting whistleblower disclosures deemed "specific, significant, and credible."
28. Participants retaliated through threats, suppression of evidence, vexatious litigant designations, and false filings.

29. Amicus Curiae suffered financial, reputational, and emotional harm.
30. Amicus Curiae is entitled to remedies under 15 U.S.C. § 78u-6(h)(1)(C).

VI. PRAYER FOR RELIEF

Victims should be entitled to;

1. Award **treble damages** under RICO (18 U.S.C. § 1964(c)).
2. Award **compensatory damages**.
3. Award punitive damages against individual and private participants.
   BARACK OBAMA;
   CHARLES "CHUCK" SCHUMER;
   JACOB "JACK" LEW;
   MARY JO WHITE;
   JAY CLAYTON;
   GARY GENSLER;
   PREET BHARARA;
   THE WASHINGTON POST;
   THE NEW YORK TIMES;
   AURELIUS CAPITAL MANAGEMENT;
   BAUPOST GROUP;
   OAKTREE CAPITAL;
   BLUEMOUNTAIN CAPITAL;
   OPPENHEIMER FUNDS;
   FRANKLIN TEMPLETON;
   Participants.
4. Declare that Participants acts violated federal law.
5. Enjoin Participants to disclose all suppressed whistleblower evidence (including HR 1049, the 22-page email, and related records).
6. Under **Dodd-Frank (15 U.S.C. § 78u-6(h))**, order:

- Reinstatement of Amicus Curiae’s whistleblower rights;

Respectfully submitted,

/s/ Richard R. Lawless
30279 Redding Avenue
Murrieta, CA 92563
951-440-5230
richardrlawless@gmail.com
Pro Se Plaintiff

Attachment A – Predicate Acts Timeline

- **2013:** Treasury/SEC 22-page email acknowledges PREPA fraud.
- **2015:** Treasury HR 1049 labels Puerto Rico debt a Ponzi scheme.
- **2015–2016:** Plaintiff’s whistleblower filing (File No. [insert]) deemed “specific, significant, credible.”
- **2016:** PROMESA passed without disclosure of fraud evidence.
- **2017–2025:** DOJ, SEC, FOMB obstruct filings and conceal evidence.
- **2021–2025:** Judge Holcomb & AUSAs manipulate dockets, retaliate, misrepresent facts.

Attachment B – Exhibits

- **Ex. A:** 2013 Treasury–SEC 22-page email.
- **Ex. B:** Treasury HR 1049 Report (2015).
- **Ex. C:** SEC Whistleblower Office acknowledgment letter (File No. [insert]).
- **Ex. D:** FOIA records showing redactions/concealment.
- **Ex. E:** Dockets & orders (C.D. Cal. 5:25-cv-01599; 5:25-cv-00773).

- **Ex. F:** PROMESA hearing transcripts.
- **Ex. G:** Harvard/Washington University studies on PREPA collapse & deaths.

EXHIBIT INDEX

Exhibit A – HR 1049 Report (Ponzi scheme, 2015).

Exhibit B – 22-page Treasury–SEC email chain (2013).

Exhibit C – SEC Whistleblower findings (Lawless, deemed 'specific, significant, and credible').

Exhibit D – DOJ transfer/declination records of Puerto Rico bond fraud cases.

Exhibit E – Jacob Lew's Citigroup employment and compensation records.

Exhibit F – Records of whistleblower outreach to national outlets.

Exhibit G – WaPo/NYT articles parroting 'local mismanagement' narrative.

Exhibit H – Federal Election Commission records ($120M+ Wall Street contributions during PROMESA).

Exhibit I – Chronological timeline (2013–2016–post).

Exhibit J – Mary Jo White Debevoise compensation documents.

Exhibit K – Jay Clayton Apollo/SDNY appointment records.

Exhibit L – FOIA redactions confirming DOJ/SEC/Treasury suppression.