

UNITED STATES DISTRICT COURT

for the

EASTERN DISTRICT OF VIRGINIA

NORFOLK DIVISION



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Dated: August 3, 2017

Robert A. Heghmann,
Plaintiff,

:

Docket No. 2:17cv411

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vs.

:

**The Republican National Committee,
Morton Blackwell, Committeeman,
Republican National Committee, Cynthia
Dunbar, Committeewoman, Republican
National Committee, the Republican Party
of Virginia, John Whitbeck, Chairman,
Republican Party of Virginia,**
Defendants,

:

Verified Complaint

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Jury Trial Demanded

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.....X

The Plaintiff for his Verified Complaint, alleges as follows:

1. This Verified Complaint is based upon personal knowledge, information derived from signed published sources, official government statutes and reports and informed beliefs.
2. The Plaintiff, Robert A. Heghmann, is a lifetime member of the Republican Party. While living in Connecticut he served as the Chairman of the Fifth

Congressional District Young Republicans and also served as an appointed member of a Westport Town Commission in a Republican administration. More recently while living in New Hampshire he ran for the U.S. Senate in the New Hampshire 2014 Republican Senate Primary where he finished 5th out of 13 candidates. During the 2016 Presidential Campaign he served as co-chair of the Trump Campaign in Wolfeboro, N.H. The Plaintiff now resides in Virginia Beach, Virginia.

3. The Republican National Committee, hereinafter “the RNC”, maintains its headquarters at 310 First Street S.E., Washington, D.C. 20003. It maintains a presence in every state with two official representatives serving as members of each state Republican Party. The RNC raises money for Republican Candidates and to support the Republican Agenda. Starting in January 2010 through the date hereof that money was raised to Repeal and Replace Obamacare. Every candidate, every state party chair and every official of the RNC sounded the same call, “Repeal and Replace”.
4. Morton Blackwell is a National Republican Party Committeeman who serves on the Virginia Republican Party. He manages a business, The Leadership Institute, located at the Steven P.J. Wood Building, 1101 N. Highland Street, Arlington, VA 22201. He is named individually, on behalf of the RNC and on behalf of all Members of the Republican National Committee.

5. Cynthia N. Dunbar is a National Republican Party Committeewoman who serves on the Virginia Republican Party. She is a faculty member at Liberty University School of Law, University Boulevard, Lynchburg, VA 24515. She is named individually, on behalf of the RNC and on behalf of all Members of the RNC.
6. The Republican Party of Virginia, hereinafter “the VGOP”, maintains its offices at the Richard D. Obenshain Center, 115 E. Grace Street, Richmond, VA 23219. The VGOP raised money for Republican Candidates and to support the Republican Agenda. Between January 2010 through November 2016 that money was raised among other reasons to Repeal and Replace Obamacare. Every candidate, every state party chair and every official of the VGOP sounded the same call, “Repeal and Replace”.
7. John C. Whitbeck, Jr. is the Chairman of the VGOP. He practices law as a principal in law firm of Whitbeck Cisneros McElroy, 105 Harrison Street, S.E. Suite 300, Leesburg, VA 20175. He is named individually, on behalf of the VGOP and on behalf of all officers and Members of the VGOP.
8. Since 2010 the Plaintiff supported the National Republican Party and the New Hampshire Republican Party in part because of its commitment to Repeal and Replace Obamacare. He contributed well over \$1,000 supporting Republican Party Events and Republican Candidates based upon the pledge of Republican

Candidates, the Republican Party, the RNC and the New Hampshire Republican Party that if Republicans contributed money and votes to the Republican Party and Republicans successfully took control of the U.S. House of Representatives and the U.S. Senate, Republicans in Congress would Repeal and Replace Obamacare through Budget Reconciliation. This pledge was made by Republican Candidates, chairpersons of the RNC and both the N.H. Republican Party and the VGOP.

9. This commitment to Repeal and Replace Obamacare was stated not only in campaign and fund raising literature but in the Republican Party Platform such as the one adopted at the Republican Party Convention in 2016 which clearly stated, “We agree with the four dissenting judges of the Supreme Court: “In our view, the entire Act before us is invalid in its entirety.” It must be removed and replaced with an approach based on genuine competition, patient choice, excellent care, wellness, and timely access to treatment. To that end, a Republican president, on the first day in office, will use legitimate waiver authority under the law to halt its advance and then, with the unanimous support of Congressional Republicans, will sign its repeal.” 2016 Republican Party Platform at p. 36.
10. This action is filed pursuant to the United States Constitution and laws passed thereunder including but not limited to the Racketeer Influenced and Corrupt

Practices Act, 18 U.S.C. 1961 et. Sec. and more specifically 18 U.S.C. Secs. 1961 (1)(B) and 1962 (c) and (d), 18 U.S.C. Sec. 1341 and 18 U.S.C. Sec. 1343 as well as VA. Code Secs. 59.1-200(14) and 18.2-178. This Court has jurisdiction under 28 U.S.C. Sec. 1331. Venue is proper under 28 U.S.C. Sec. 1391(b) (2).

11. The Republican Party through its fund raising arm the Defendant RNC/, directly and through state republican parties, including but not limited to the VGOP, has been engaged in a pattern of Racketeering which involved a massive fraud perpetrated on Republican voters and contributors as well as some Independent and Democrat voters and contributors. Since this pattern of Racketeering included advertising and solicitation of financial contributions made through interstate commerce including the mails and secure web sites using credit cards on one end and bank accounts on the other it would not have been possible without reliance on interstate wire communications. Therefore, the predicate statutory violations involve violation of the mail and wire fraud statutes, 18 U.S.C. 1341 and 18 U.S.C. Sec. 1343.

12. As early as November, 2012, the leaders of the Republican Party knew that the Republican Party was not going to Repeal and Replace Obamacare. After the Re-election of President Obama in the November 2012 election, Speaker

John Boehner admitted that Obamacare was not going to be repealed.

Speaking to reporters he stated flatly, “Obamacare is now the law of the land”

Boehner: Obamacare is the law of the land, politico.com, 11/08/2012.

13. In making this statement Speaker Boehner was sending a message to House Republicans and others that Repeal was not going to happen. He was trying to put the issue to rest. James Sullivan, Boehner: Obamacare Repeal and Replace is not going to happen, thehill.com, 02/23/17. Nevertheless, the Republican Party continued to use the mails, wires and interstate commerce to solicit donations and votes to secure House and Senate majorities and ultimately the Presidency. Now that the Republican Party has won the House, the Senate and the Presidency the effort it is making to Repeal and Replace Obamacare is itself a Fraud upon Republican Voters and Donors.

14. Speaker Boehner’s comments reported on November 8, 2012 constitute conclusive evidence that from November, 2012 forward the Republican commitment to “Repeal and Replace” was a deliberate fraud upon voters and donors. Even though Speaker Boehner is not a party to this action and his statements were extra judicial, the law in this Circuit is that these statements establish that the Defendants herein knew or should have known that their promise to “Repeal and Replace” was a total and intentional fraud. *International Refugee Assistance Project v. Donald J. Trump*, App. No. 17-

1351, 05/25/2017, Slip Opinion at 22, 51 and 57 (Gregory, C.J.). As early as November, 2012, the leaders of the Republican Party knew that the Republican Party was not going to Repeal and Replace Obamacare. Nevertheless, the Republican Party continued to use the mails, wires and interstate commerce to solicit donations and votes to secure House and Senate majorities and ultimately the Presidency.

15. The Repeal and Replace campaign was fabulously successful. During the 2009-10 election cycle the RNC collected \$166,538,402 in contributions according to the Federal Election Commission. The VGOP raised \$2,209,096. With these funds the Republican Party captured the U.S. House of Representatives in the November 2010 elections. The Democrat Party retained the Senate and the Presidency.

16. During the 2011-12 election cycle the RNC collected \$222,697,264 in contributions and the VGOP raised \$1,618,817. With these funds the Republican Party held the House in the 2012 elections and made gains in the Senate although the Democrat party still held the Senate and President Obama was re-elected.

17. After Speaker Boehner admitted that Repeal and Replace was not going to happen, during the 2013-14 election cycle the RNC collected \$176,747,243 and the VGOP collected \$978,357. With these funds the Republican party

gained control of both the House of Representatives and the Senate although the Presidency remained in Democrat hands.

18. When the 114th Congress was sworn in January, 2015 Republicans controlled both the House and the Senate. The Republican Party could have Repealed Obamacare as contained in the Stimulus Act and Replaced the expensive policies under the Exchanges with more affordable policies under the Community Health Insurance Option. Instead, claiming Obamacare existed only in the ACA which they could not change without 60 votes in the Senate and with President Obama in office, they once again issued their Battle Cry of “Repeal and Replace” in order to collect money and votes.

19. During the 2015-16 election cycle the RNC raised \$171,288,428 and the VGOP collected \$1,028,339. With these funds the Republican Party held the House and the Senate and the Republican Candidate, Donald Trump, won the Presidency. Despite this victory the Republican Party made no meaningful effort to Repeal and Replace Obamacare.

20. There are three separate Enterprises involved in this Pattern of Racketeering. The central Enterprise is the RNC and its officers and directors. It coordinated the Repeal and Replace Campaign through and conspired with individual Republican candidates running for the House and the Senate as well as affiliated State Republican Parties. Republican Candidates running for public

office formed the second Enterprise. Although each candidate ran an individual campaign, their campaigns were united by the common theme of Repeal and Replace and a common goal, majorities in both the House and the Senate. The third Enterprise is the State Republican Parties, in this case the VGOP, which coordinate and conspire with the RNC and individual candidates during the Repeal and Replace Campaign.

Repealing Obamacare

21. Obamacare is actually an I.T. based primary health care allocation system contained in four separate pieces of legislation. The first piece of legislation was the American Recovery and Reinvestment Act, P.L. 111-5, 123 Stat. 115 (hereinafter “the Stimulus Act”). The second was the Patient Protection and Affordable Care Act, P.L. 111 – 148 (hereinafter the A. C. A.). The House piece of the health care legislation was the Health Care and Education Reform Act, P.L. 111 – 152 (hereinafter “the H.C.E.R.A.”) The final piece was amendments to the legislation creating the Independent Payment Advisory Board, P.L. 114 – 38, 42 U.S.C. Sec. 1395 kkk (hereinafter “the IPAB”). If the Republican Party had been serious about repealing and replacing Obamacare, each of these legislations would have to be either repealed or modified, not just the ACA.

22. The heart and soul of Obamacare is constituted in the Health Care Provisions contained in the Stimulus Act. President Obama had long expressed an interest in a National Health Care System. In 2007 he stated, "It is my belief that not just politically but also economically, it's better for us to start getting a system in place—a universal health care system—signed into law by the end of my first term as president and build off that system to further—to make it more rational—by the way, Canada did not start off immediately with a single-payer system. They had a similar transition step." Ron Pisaturo, www.ronpisturo.com, 03/20/2010 (citing Fox News)

23. In 2006 the Canadian Health Care System spent \$3,678 per person or 10% of Canada's G.D.P. compared to \$6,714 per person or 15.3% of G.D.P. for the U.S. System. Obama and the Democrats (and later the Republicans) saw the Canadian system of managing health care and rationing as the means to closing the Budget gap without making painful political decisions. The Health Care Provisions in the Stimulus Act are all about controlling access to health care and rationing.

24. There is no question that the part of the Plan contained in the Stimulus Act is designed to ultimately create a single payer system. Senate majority Leader Harry Reid speaking on a PBS Program, Nevada Week in Review, in Las Vegas confirmed this. "In just about seven weeks, people will be able to start

buying Obamacare-approved insurance plans through the new health care exchanges. But already, Senate Majority Leader Harry Reid is predicting those plans, and the whole system of distributing them, will eventually be moot. Reid said he thinks the country has to “work our way past” insurance-based health care during a Friday night appearance on Vegas PBS’ program “Nevada Week in Review.” “What we’ve done with Obamacare is have a step in the right direction, but we’re far from having something that’s going to work forever,” Reid said. When then asked by panelist Steve Sebelius whether he meant ultimately the country would have to have a health care system that abandoned insurance as the means of accessing it, Reid said: “Yes, yes. Absolutely, yes.” Gene Vieth, Obamacare a Step Towards Single-Payer System, www.patheos.com, 08/12/2013

25. Even before the ink was dry on the Stimulus Act, commentators on the internet were correctly announcing that Canadian Style Nationalization of Health Care was contained in the Act. See Steven Pearlstein, Bloviation vs. Reality on Stimulus-Health-Care Provision, www.washingtonpost.com, 02/13/2009; Kim Priestap, Alert: Nationalization of Health Care in Stimulus Bill, www.wizbangblog.com, 02/10/2009; Devvy, Obama Care Passed in Stimulus Bill; More Treachery in Sept., www.newswithviews.com, 08/17/2009.

26.Despite the fact that the principal part of Obamacare, the path toward a single payer system and the end of private insurance, was in the Stimulus Act, during its passage the Washington Establishment, both Republicans and Democrat, went out of their way to assure the public that there were no health care provisions in the Stimulus Act. On an MSNBC edition of Andrea Mitchell Live aired while the Stimulus Act was being debated Republican Senator Arlen Specter and Democrat Congressman Henry Cisneros both looked into the camera and assured the American People that there were no health care provisions in the Stimulus Act. Their statements were totally false.

27.The Fraud that was begun during the passage of the Stimulus Act continues to this day. The Republican Establishment in both the Senate and the House continue to equate Obamacare exclusively with the A.C.A. The Health Care Provisions in the Stimulus Act, specifically the nationalization of health care envisioned by the Obama Administration, are never mentioned. The Washington Establishment including the Republican Party has no intention of repealing Obamacare as that term is understood by the consultants who designed it, myself and I believe the rank and file Republicans, Independents and some Democrats who contributed to the Republican Party and voted for Republican Candidates since January, 2010 for the express purpose to Repeal and Replace Obamacare.

28.Despite this pledge, when the Republican Party won control of both the House and the Senate in the November 2014 elections and took control of the Budgetary Process in January, 2015, the Republican Party failed to Repeal Obamacare in the Stimulus Act as part of Budget Reconciliation process although it had the power to do so. Instead, citing the A.C.A. as Obamacare instead of the Stimulus Act, the Republican Party and the Republican National Committee and its state agents such as the VGOP solicited additional millions in campaign contributions to enable the Republican Party to win the White House in 2016 stating that when the Republicans controlled the House, Senate and the White House the Republican Party would Repeal and Replace Obamacare.

29.In the November, 2016 elections the Republican Party held the House and the Senate and won the White House. On January 20, 1017 the Republican Party took full political control of the Government yet it made no effort to Repeal Obamacare as established by the Stimulus Act and Replace it with affordable health insurance for every American. Instead, it is negotiating Insurance Reform under the A.C.A., reforms which will not Repeal Obamacare nor provide affordable health insurance for every American.

Replace

30. Apparently not all Democrats believed that insurance reform consisting of insurance policies sold on the Exchanges and the Consumer Owned and Operated Plans with all the expensive new coverages would provide adequate, affordable insurance premiums and deductibles for all families. They apparently insisted on a third option, the Community Health Care Option. Therefore, since Majority Leader Harry Reid needed all sixty Democrats in the Senate, the A.C.A. as originally drafted contained Sec. 1323 Community Health Insurance Option at page 188 of the Act.

31. Unlike the more expensive policies offered by the Exchange or the C.O.O.P.S., the policies offered under the Community Health Insurance Option provided coverage only for the essential health benefits described in section 1302(b). A.C.A. Sec. 1323 (3)(A) Even though these are less expensive plans, individuals enrolled under this Option would be eligible for credits in the same manner as an individual who is enrolled in a more expensive plan purchased through the Exchanges or the Community Owned and Operated Plans. A.C.A. Sec. 1323 (3)(c).

32. While providing for more limited benefits, the Community Health Insurance Option is the only option under the A.C.A. which allows patients to purchase health care not covered by the plans they purchased presumably through

Health Savings Accounts. “Nothing in this Act shall prohibit an individual enrolled in a community health insurance option from paying out-of-pocket the full cost of any item or service not included as an essential health benefit or otherwise covered as a benefit by a health plan. Nothing in subparagraph (B) shall prohibit any type of medical provider from accepting an out-of-pocket payment from an individual enrolled in a community health insurance option for a service otherwise not included as an essential health benefit.” A.C.A. Sec. 1323 (3)(E).

33. In order to make the Community Health Insurance Option less expensive, the Act exempts policies under this Option from offering required coverages under the more expensive plans. A.C.A. Sec. 1324 (a). The A.C.A. then set forth the exemptions enjoyed by the community Health Insurance Option, “(b) LAWS DESCRIBED.—The Federal and State laws described in this subsection are those Federal and State laws relating to—(1) guaranteed renewal; (2) rating; (3) preexisting conditions; (4) non-discrimination; (5) quality improvement and reporting; (6) fraud and abuse; (7) solvency and financial requirements; (8) market conduct; (9) prompt payment; (10) appeals and grievances; (11) privacy and confidentiality; (12) licensure; and (13) benefit plan material or information. A.C.A. Sec. 1324 (b).

34. Democratic Leadership hated the Community Health Plan Option because it is a stake in the heart of single payer which is the ultimate Democrat goal. Therefore on Christmas Eve as the House and Senate rushed to approve the A.C.A., Democrat Leadership inserted a Special Order stripping the A.C.A. of the Community Health Care Option which provided, “(m) Part III of subtitle D of title I of this Act is amended by striking section 1323.(n) Section 1324(a) of this Act is amended by striking “, a community health” and all that follows through “1333(b)” and inserting “, or a multi-State qualified health plan under section 1334”. A.C.A. at p. 2085.

35. But the Democrat Leadership did not have time to re-draft the A.C.A. after it passed the House and Senate. President Obama had postponed his Christmas Vacation to make sure the Act passed and he insisted on signing the law as adopted immediately. Therefore, both the Community Health Insurance Option and its “repeal” were in the final version of the A.C.A. and both were signed into law. The Community Health Insurance Option and its “repeal” are inconsistent provisions in the same law.

36. Therefore the Republican Majority has the power to restore the Community Health Insurance Option by issuing a one page, one sentence Bill, “The Patient Protection and Affordable Care Act Secs. 1303(l)(2)(m) (n)(o) and (p) are ineffective and Sections 1323 and 1324 are restored as fully set forth in the

Act.” This would allow health care consumers to immediately begin purchasing affordable, comprehensive health insurance.

37. The Republican majorities in the House and the Senate had the power under Budget Reconciliation to restore the Community Health Insurance Option since February 2015 and has failed to do so. Thus the Republican majorities promise to replace Obamacare has been and is a total fraud.

P.L. 115 – 31 The Consolidated Appropriation Act of 2017 (May 5, 2017)

38. The Pattern of Racketeering engaged in by the Defendants was not limited to health care. During the 2015 – 2016 election cycle it extended to virtually the entire Republican Platform and the campaign promises of Republican Presidential Nominee Donald J. Trump. While ostensibly supporting the Trump Agenda and the Republican Platform in order to continue to receive political donations and the votes of Republicans, Democrats and Independents, the Republican Party never intended to implement the Trump Agenda or fulfill the promises of the Republican Platform.

39. Any doubt that the Republican Party never intended to fulfill the promises contained in the Republican Platform or stated during the campaign by the Republican Nominee Donald J. Trump was conclusively proved by the Consolidated Appropriation Act of 2017. Although the Republican Party controlled both the House and the Senate and therefore totally controlled the

Budget Process, the Republican Party totally rejected the promises made and the reasons Republicans, Democrats and Independents voted for Donald Trump and the Republican ticket across the Nation.

40. One of Donald Trump's first campaign promises was to secure the Nation's Southern Border by building a Wall across the entire Southern border. "Build the Wall! Build the Wall!" became a staple cry of Trump supporters at rallies across the country. Those rallies were broadcast in their entirety across the Nation on all the major T.V. news networks. They were also part of the Republican Party National Campaign which included use of the mails and interstate wires. Upon being elected President-Elect Trump asked the House and Senate Republicans to include \$3 Billion in the 2017 Consolidated Appropriation for the Wall. In the interim President Trump stated he would use a 2006 law and available federal funds to begin construction.

41. In the Final Consolidate Appropriation not only did the House and Senate Republicans not obtain an additional \$3 Billion to begin construction of the Wall, they agreed to a provision that puts strict limits on how President Trump can use new money for border security and to prevent the use of currently available funds under the 2006 law. This provision limiting the use of currently available funds under the 2006 law is the "smoking gun". It makes a total lie of any claim that the Republican Party intended to fulfill the

campaign promises made in the Republican Platform and made on the campaign trail by Republican Nominee Donald J. Trump and almost every Republican Candidate who requested money and votes from Trump supporters.

42. Nor was building the Wall the only Republican Campaign Promises made to Republican, Democrat and Independent voters and donors which was totally rejected by the Republican Party in the Consolidated Appropriation. Also rejected were a number of other Promises made during the campaign to solicit contributions and votes, Promises the Republican Party never intended to keep. These broken Promises will be detailed at trial.

Count I

Racketeering, Mail Fraud, Wire Fraud

43. The Plaintiff reasserts and restates the allegations contained in paragraphs 1 through 42 as if fully set forth herein.

44. The Defendants RNC and VGOP collected over \$735 Million by promising that the Republican Party would “Repeal and Replace” Obamacare. That promise was false and fraudulent. The Obamacare contained in the Stimulus Act was never going to be repealed. Nor were the expensive insurance policies sold on the Exchanges going to be replaced by health insurance with premiums and deductibles the middle class could afford under the Community

Health Insurance Option. Yet by falsely promising to achieve these results, the RNC and the VGOP were able to fraudulently obtain millions in campaign contributions from Republicans, Independents and some Democrats.

Count II

Racketeering, Mail Fraud, Wire Fraud

45. The Plaintiff reasserts and restates the allegations contained in paragraphs 1 through 44 as if fully set forth herein.

46. As of January 2015 when the new Congress was sworn in with both the House and the Senate controlled by Republicans, the Republican party could have Repealed that portion of Obamacare contained in the Stimulus Act and Replace the expensive policies sold on the Exchanges with affordable policies under the Community Health Insurance Option. They did not do so. Instead they claimed that because of the taxes contained in the A.C.A. they were powerless to Repeal or Replace Obamacare as part of Budget Reconciliation. This representation was false and fraudulent. Nevertheless, the Republican National Committee continued to solicit contributions stating that if the Republicans won the Presidency then they could Repeal and Replace Obamacare.

47. This failure to disclose that they could have Repealed and Replaced Obamacare under the Stimulus Act operated as a fraud upon those

Republicans, Independents and Democrats who contributed to the RNC and VGOP between 1/1/15 and the Present.

Count III

Fraud, Mail Fraud and Wire Fraud

48. The Plaintiff reasserts and restates the allegations contained in paragraphs 1 through 47 as if fully set forth herein.

49. The RNC and VGOP continue to deceive the Republicans, Independents and Democrats who support Repeal and Replace that Obamacare is in the A.C.A. and not in the Stimulus Act. They continue to mislead donors that they are attempting to Repeal and Replace Obamacare and continue to solicit donations when in fact nothing they are doing in Congress will result in the Repeal of the core provisions of Obamacare contained in the Stimulus Act and Replace it with affordable health insurance under the Community Health Insurance Option.

Count IV

Fraud, Mail Fraud and Wire Fraud

50. The Plaintiff reasserts and restates the allegations contained in paragraphs 1 through 49 as if fully set forth herein.

51. Numerous Promises were made by the Donald J. Trump, the Defendants and the Republican Party during the 2015 – 2016 campaign to attract donations

and votes from Republican, Democrat and Independent voters and donors. As President Donald Trump is doing everything he possibly can to fulfill his campaign promises. As is evidenced by the Consolidated Appropriation of 2017 the Republican Party is doing everything it can to prevent him from fulfilling his campaign promises.

WHEREFORE, the Plaintiff demands a Judgment that:

1. The RNC and the VGOP acting on behalf of the Republican Party falsely and fraudulently solicited donations from Republicans, Independents and Democrats by promising that if they controlled first the House and later the Senate and finally the White House that the Republican Party would Repeal and Replace Obamacare;
2. The RNC and VGOP acting on behalf of the Republican Party falsely and fraudulently solicited donations from Republicans, Independents and Democrats by promising that if they controlled first the House and later the Senate and finally the White House that the Republican Party would Repeal and Replace Obamacare without revealing that since

February, 2015 they could have Repealed and Replaced Obamacare as part of Budget Reconciliation;

3. A Judgment that all the donations collected by the RNC and the VGOP from 11/08/2012 to the present were solicited, collected AND obtained by mail and wire fraud;
4. A Judgment that if the Republican Party does not fulfill the campaign promises they made on the national stage during the 2016 – 16 election cycle starting with the promise to Repeal and Replace Obamacare by Repealing the HITECH Act in the Stimulus Act, Repealing the Interim Final Rule and the Final Rule, Repealing the changes in IPAD and Replacing the expensive insurance policies with the Community Health Care Option then the Defendants must return all of the donations received since January, 2013 as recorded in the records of the Federal Election Commission;
5. A Judgment that awards the Plaintiff his out of pocket costs and expenses; and
6. Any other relief the Court deems just and reasonable.

The Plaintiff,



Robert A. Heghmann

SWORN STATEMENT

On this the 3rd day of August [@]~~June~~, Year of Our Lord 2017, Robert A. Heghmann did appear before me and upon being duly sworn did execute this Complaint as his own free act and deed.



NOTARY PUBLIC

