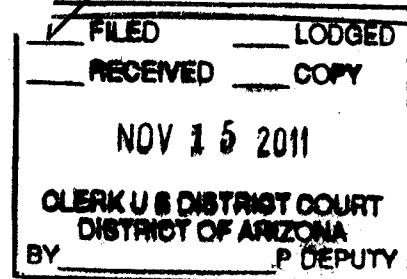


1 Richard J. Harris (#013859)  
2 Harris & Assoc. P.C.  
3 4204 Timbercreek Cir.  
4 Roswell, GA 30076  
5 Telephone: (678) 733-1408  
6 Richard.j.harris@azbar.org

7 Edmundo P. Robaina (018125)  
8 ROBAINA & KRESIN PLLC  
9 One E. Camelback Road, Suite 710  
10 Phoenix, Arizona 85012  
11 Telephone: (602) 682-6450  
12 Facsimile: (602) 682-6455  
13 epr@robainalaw.com

14 Attorneys for Plaintiff



**SEALED**

15 IN THE UNITED STATES DISTRICT COURT  
16 FOR THE DISTRICT OF ARIZONA

17 **United States *ex rel.* Christine Hunt,**

18 Plaintiff-Relator,

19 v.

20 **Maricopa County Community**  
21 **College District; Dr. Paula Vaughn**  
22 **and Richard Vaughn, husband and**  
23 **wife,**

24 Defendants.

25 No. CV-11-2241-PHX-MEA

26 **COMPLAINT**  
27 **FILED UNDER SEAL**

28 **Jury Trial Requested**

Plaintiff-Relator Christine Hunt for her complaint alleges as follows:

1. This is an action by *qui tam* Relator Christine Hunt (hereinafter "Relator" or "HUNT"), on behalf of herself and the United States Government, to recover penalties and damages resulting from violations of the False Claims Act by Defendant Maricopa County Community College District ("MCCCD"). Hunt also brings personal actions against Defendant MCCCD for damages resulting from its retaliation against her employment conditions in violation of the anti-retaliation provisions of the False Claims Act and under state law.

**JURISDICTION AND VENUE**

1  
2 2. This action arises under the False Claims Act, 31 U.S.C. § § 3729, et seq. (the  
3 “FCA”).

4  
5 3. This Court has subject matter jurisdiction over this matter pursuant to 31 U.S.C. §  
6 3732(a); 28 U.S.C. § 1345 and 1367(a).

7 4. This Court has personal jurisdiction over the Defendant.

8  
9 5. Venue is proper in this district under 28 U.S.C. §§ 1391(b) and 1391(c), and  
10 under 31 U.S.C. § 3732(a). The Defendant can be found, resides and transacts  
11 business within the district, and the acts proscribed by the FCA occurred within  
12 the district.

13 6. Relator is entitled to and demands trial by jury.  
14

**PARTIES**

15  
16 7. Relator is a resident of Arizona and a United States citizen. Relator graduated in  
17 1986 from Iowa State University with a Bachelor of Arts degree in Inter-  
18 disciplinary Studies. She is the original source of the information alleged herein.

19  
20 8. Relator has been employed by Defendant MCCCCD since she was hired in 2001 in  
21 the Paradise Valley Community College (“PVCC”) Continuing Education Office.

22 9. Relator is currently employed in the position of academic advisor at PVCC. Her  
23 primary duties are to advise students regarding class choices, transferring credits  
24 to and from other schools. She is also the primary advisor to the nursing program  
25 at PVCC where her duties are to work with students in advising students on  
26 academic requirements for the nursing program.  
27  
28

1 10. Defendant MCCCCD is a political subdivision of the State of Arizona operating  
2 within Maricopa County, Arizona. It is the legal entity responsible for operation  
3 of community colleges in Maricopa County, including PVCC.  
4

5 **GOVERNING REGULATIONS AND BACKGROUND**

6 11. AmeriCorps is a federal government program established in 1993 when President  
7 Clinton signed into law the National and Community Service Trust Act. Under  
8 the program, individuals can provide service to others and receive federal moneys  
9 for doing so.  
10

11 12. AmeriCorps members who complete a term of service may receive an  
12 AmeriCorps Education Award.

13 13. The AmericCorps Education Award is granted to members who are serving, part-  
14 time or full-time, in participating programs through AmericCorps. After  
15 completing a term of service, AmeriCorps members are eligible to receive the  
16 Segal AmeriCorps Education Award to pay education costs at qualified  
17 institutions of higher education, for educational training, or to repay qualified  
18 student loans.  
19

20  
21 14. Institutions like MCCCCD coordinate and submit records of service to the federal  
22 government for AmeriCorps members electronically and the federal government  
23 makes payments to qualified schools or loan holders.  
24

25 15. Project Ayuda is an AmeriCorps project.

26 16. Defendant MCCCCD sponsored a series of classes called the SLICE program  
27 (Serve, Learn, Inspire, Change and Educate) through which MCCCCD  
28 administered a Project Ayuda Program.

**FACTUAL ALLEGATIONS**

1  
2 17. The allegations of the preceding paragraphs are incorporated herein by reference.

3 **MCCCD and SLICE**

4  
5 18. In the summer of 2009, Dr. Paula Vaughn, PVCC's director of Service Learning,  
6 caused an AmeriCorps member, Lyndsey Grinstead, to forge signatures on  
7 Project Ayuda forms.

8  
9 19. Grinstead shared an office with Relator at the time and Relator personally  
10 witnessed Grinstead practicing forging signatures on scrap paper. Grinstead  
11 later told Relator that she (Grinstead) felt pressured by Dr. Vaughn because  
12 Vaughn controlled her grade in the SLICE program and her job in the Honors and  
13 Service Learning Office.

14  
15 20. Beginning in 2007, Dr. P. Vaughn caused timecards to be pre-printed and  
16 distributed to the SLICE students who were participating members in Project  
17 Ayuda. The pre-printed timecards showed member project hours in excess of the  
18 hours actually served.

19  
20 21. Relator began working in the Honors and Service Learning Office of PVCC in  
21 summer 2008.

22 22. In or before February 2009, Dr. Vaughn began giving SLICE student leaders pre-  
23 printed monthly timecards for their Project Ayuda service. The timecards totaled  
24 900 hours of service for the 2009 program year.

25  
26 23. Dr. Vaughn instructed the student leaders to sign the timecards as pre-printed.

27 24. The student leaders signed the timecards as pre-printed.  
28

1 25. Contrary to the statements in the pre-printed timecards, student leaders did not  
2 provide 900 hours of service in the 2009 program year. At least one student  
3 leader (Jeremy Bowker) discussed this fact with Relator during the 2009 program  
4 year.  
5

6 26. Beginning in about February 2009, Dr. Vaughn gave SLICE student participants  
7 pre-printed monthly timecards for their Project Ayuda service. The timecards  
8 totaled 300 hours of services for the 2009 program year.  
9

10 27. Dr. Vaughn instructed the student participants to sign the timecards as pre-  
11 printed.  
12

13 28. The student participants signed the timecards as pre-printed.  
14

15 29. Contrary to the statements in the pre-printed timecards, student participants did  
16 not provide 300 hours of service in the 2009 program year. Several student  
17 participants (including Damon Cetro) discussed this fact with Relator during the  
18 2009 program year.

19 **Nursing Students Getting Project Ayuda Hours and Awards**

20 30. During Summer 2008, Relator learned that MCCCDC encouraged its nursing  
21 students to report nursing classes and clinical service hours toward Project Ayuda  
22 hours for education awards. Between Summer 2008 (when Relator started) and  
23 June 2010 (when Relator was removed from the office), several nursing students  
24 submitted timecards to Relator to deliver to Amanda Hines (Project Ayuda  
25 coordinator). MCCCDC admits about 400 nursing students per semester. On  
26 information and belief, this practice started before 2008 and continued after 2010.  
27  
28

1 **Work Study Students Getting Project Ayuda Hours**

2 31. Work Study is a federal government financial aid program that allows eligible  
3 students to work on campus in certain positions and be paid for their work.  
4

5 32. From fall 2008 to 2010 (during the time Relator worked in Honors and Service  
6 Learning Office), PVCC had two work-study positions in the Honors and Service  
7 Learning Office. Dr. Vaughn advertised that eligible work study students who  
8 took those jobs could also receive Project Ayuda education award by submitting  
9 their work study hours to Project Ayuda. In at least one instance Dr. Vaughn  
10 even allowed a work study eligible student (Danielle "Lellee" Karkkainen)  
11 outside of the Honors and Service Learning Office to submit work study hours to  
12 Project Ayuda. On information and belief, Dr. Vaughn employed this double  
13 dipping scheme before fall 2008 and continued until 2010.  
14  
15

16 **Summer SLICE Cyprus Trip**

17 33. July 20 – August 6, 2011, MCCCDC offered an education abroad program led by  
18 Doss Powell, a professor of anthropology at PVCC. The program advertised that  
19 it provided service and learning opportunities for its students.  
20

21 34. Two students (Brett Bartell and Jose Aispuro) informed Relator that Dr. Vaughn  
22 offered 900 Project Ayuda hours for students participating in the Cyprus study  
23 abroad program.  
24

25 35. On information and belief, students who participated in the Cyprus study abroad  
26 program were given AmeriCorps Educational Awards based on 900 hours of  
27 service in a foreign country.  
28

1 36. On information and belief, the award money was used to pay costs of future  
2 education, thus offsetting all but about \$1,000.00 of the cost of the study abroad  
3 program. Accordingly, students who might not have otherwise gone were  
4 enticed to go on the trip.  
5

6 37. On information and belief, MCCC and Dr. Vaughn caused students to submit  
7 factually false records of service hours to Project Ayuda for hours not served and  
8 for service in a foreign country (Cyprus) violating AmeriCorps rules and the law.  
9

10 **New Mexico Trip, Summer SLICE**

11 38. During the summer of 2010, PVCC offered a summer class by Doss Powell, a  
12 professor of anthropology at PVCC, in which students went to New Mexico to  
13 participate in an archeological dig. Dr. Vaughn referred to the class as summer  
14 SLICE ("Summer SLICE").  
15

16 39. Because Relator worked in the Honors and Service Learning office with Dr.  
17 Vaughn, Relator became aware that Dr. Vaughn was giving Project Ayuda hours  
18 to students participating in Summer SLICE.  
19

20 40. For example, Theresa 'Rochelle' Shannon went on Summer SLICE and earned  
21 Project Ayuda education award.  
22

23 41. For example, Susanne Egan went on Summer SLICE and earned Project Ayuda  
24 education award money.  
25

26 42. On information and belief, students who participated in Summer SLICE were  
27 given AmeriCorps Educational Awards in excess of the amount warranted by the  
28 actual service rendered.

1 43. On information and belief, the award money was used to pay costs of subsequent  
2 education, including costs at MCCCCD.

3 44. The AmeriCorps Education Award money enticed students to enroll with  
4 Summer SLICE program.

5 45. On information and belief, Defendants used the same New Mexico trip scheme in  
6 summer 2009.  
7

8 **DiversityInc.**  
9

10 46. In summer 2011, P VCC offered a program called DiversityInc. This was a three  
11 semester program (to conclude in Spring 2012). PVCC described the program as  
12 follows: "PVCC's DiversityInc. is designed to have group of students facilitate  
13 inclusiveness and social change. Students will learn about themselves, others,  
14 and new perspectives about the world around them by volunteering for those less  
15 fortunate."  
16

17 47. The DiversityInc. application stated that: "the nine credits of this program are  
18 fully paid for by AmeriCorps Project Ayuda, in which you sign an agreement to  
19 complete all nine credits with a passing grade of 'B' or better."  
20

21 48. PVCC advertised that DiversityInc. required a commitment of 20 hours of service  
22 per month (240 hours per year), but offered an AmeriCorps education award of  
23 \$2,675.00, an amount corresponding to 900 service hours.  
24

25 49. However, AmeriCorps requires 630 of the 900 hours to be direct service.

26 50. On information and belief, Dr. Vaughn caused about 18 students to create records  
27 of hours worked in service, fund raising and/or training hours related to  
28



1 DiversityInc. for which no hours (or fewer hours than those recorded) were  
2 actually worked.

3 **America Reads**

4  
5 51. Beginning in 2005 or 2006, PVCC began administering a work study program  
6 associated with America Reads Challenge (a Clinton administration anti-illiteracy  
7 initiative “America Reads”).

8  
9 52. Under the program, students could get federal money based on hours worked  
10 tutoring children in reading and math.

11 53. By spring of 2009, Relator learned that Dr. Vaughn allowed students to get  
12 AmeriCorps Education Awards based on Project Ayuda service hours for hours  
13 worked on America Reads.

14  
15 54. Accordingly, Dr. Vaughn caused students to “double dip” into federal financial  
16 aid, getting both work study pay and AmeriCorps Education Awards based on the  
17 same hours worked/served.

18 **Project Ayuda Grant**

19  
20 55. In 2005 and again in 2008, PBCC and Dr. Vaughn applied for and received  
21 AmeriCorps Project Ayuda grant money from the Corporation for National and  
22 Community Service.

23  
24 56. In approximately early 2008 Dr. Vaughn and PVCC hired Dr. Vaughn’s close  
25 personal friend, Amanda Hines as Project Ayuda coordinator in the Service  
26 Learning Office. On information and belief, PVCC paid the salary of Amanda  
27 Hines from the Project Ayuda grant money.  
28

1 57. From the time of her hire until May 2010, Amanda Hines regularly failed to  
2 clock out for lunch and accordingly, her time records show at least one hour per  
3 work day above and beyond her time worked.

4  
5 58. On information and belief, Hines only stopped this practice after Relator reported  
6 it to PVCC administration in March 2010.

7 59. On information and belief, Dr. Vaughn misused the grant money by paying for  
8 Amanda Hines to participate in a trip to San Diego in March 2010 despite the fact  
9 that Hines had virtually no responsibilities on that trip.

10  
11 60. On information and belief, Dr. Vaughn misused grant money in about February  
12 2010 by hiring Jose "Israel" Montero to replace Jeremy Bowker to work on the  
13 SLICE program. Bowker earned \$10.00 per hour for his work from August 2009  
14 until he quit on or about February 10, 2010. Dr. Vaughn replaced Bowker by  
15 hiring Montero to do the same job. However, Dr. Vaughn and PVCC paid  
16 Montero \$13.00 per hour to do that same work.

17  
18 61. Under MCCCDC guidelines, the college cannot pay different wages for the same  
19 work. Accordingly, the preferential payment for Montero violated the guidelines  
20 and constitutes waste and abuse.

21  
22 **Retaliation**

23 62. On March 23, 2010, Relator filed a verbal complaint with Bill Hart (then the  
24 Associate Dean of Students at PVCC) concerning the fraud waste and abuse of  
25 federal funds and unethical actions by Dr. Paula Vaughn. Bill Hart told Relator  
26 that she was protected in making the report.  
27  
28

1 63. On May 23, 2010, Relator reported Dr. Paula Vaughn's fraudulent behavior to  
2 Debra Pearson, a member of the governing board of MCCCCD.

3 64. Notwithstanding Defendant MCCCCD's knowledge that Relator's report was  
4 protected activity and notwithstanding its assurances of anonymity, MCCCCD  
5 revealed to Dr. Vaughn the fact that Relator had reported her illegal conduct.  
6

7 65. Dr. Vaughn found out Relator had reported her conduct that was in violation of  
8 the FCA on April 21, 2010.  
9

10 66. On or about May 10, 2010, MCCCCD forced Relator to participate in an annual  
11 evaluation notwithstanding the facts that: 1) she had had an evaluation only five  
12 months earlier; 2) MCCCCD policy prohibits a negative evaluation when an  
13 employee has filed a protected whistleblowing complaint; 3) she asked Dr.  
14 Vaughn twice to postpone the evaluation pursuant to MCCCCD whistleblower  
15 policy and the MCCCCD Professional Staff Policy Sec. 2.13.3; 4) Relator asked  
16 PVCC's Human Resources representative, Laural Smith, to postpone the  
17 evaluation based on her whistleblower status; and 5) Relator asked Judy  
18 Castellanos in MCCCCD Human Resources to postpone the evaluation based on  
19 her whistleblower status.  
20  
21

22 67. Dr. Vaughn, her husband, Richard Vaughn, and Sherry Adams (the latter two  
23 being over the honors program) conducted the evaluation.  
24

25 68. The evaluation was negative in that it noted areas where Relator's performance  
26 was inadequate and needed improvement.  
27  
28

1 69. Whereas her review only five months earlier revealed only two areas for  
2 improvement, the evaluation in May 2010 showed at least 14 areas for  
3 improvement. Thus the evaluation was negative and in violation of MCCC'D's  
4 own whistleblower protection policy.  
5

6 70. On May 20, 2010, Relator took her complaints to Dr. Rufus Glasper, Chancellor  
7 of MCCC'D. Glasper expressed surprise that PVCC administration had not  
8 moved Relator from her position as soon as Dr. Vaughn learned of Relator's  
9 whistleblowing against her.  
10

11 71. Bill Hart told Relator that MCCC'D violated her rights in conducting the  
12 evaluation.  
13

14 72. Bill Hart attempted to have Dr. Vaughn removed or transferred, but was  
15 unsuccessful (this despite the fact that Dr. Vaughn, too, asked to be removed).  
16

17 73. The workplace became hostile to the point that any reasonable person would have  
18 felt compelled to quit. MCCC'D representative Hart indicated it would be easier  
19 to move Relator than to move Dr. Vaughn. Accordingly, MCCC'D pressured  
20 Relator to draft and sign a request to be removed from her position and office.  
21 Reluctantly, Relator did so, but she fully expected her Honors program  
22 responsibilities would go with her.  
23

24 74. On June 21, 2010, Bill Hart removed Relator from her position in the Service  
25 Learning/Honors Office and into the Student Life Office. In connection with the  
26 move, MCCC'D removed from Relator all of her job functions in those offices,  
27 including the Honors program functions.  
28

- 1 75. On June 21, 2010, MCCCCD Relator wanted to return to her office in Service  
2 Learning/Honors to get her personal effects and certain committee files that were  
3 to go with her. MCCCCD said she could not go unless Dr. Vaughn was present  
4 and MCCCCD assigned a campus police escort to supervise Relator in the process.  
5
- 6 76. Relator lost access to her computer (in violation of MCCCCD practice) and  
7 thereby also lost access to documentation stored thereon that would support her  
8 *qui tam* complaints.  
9
- 10 77. Relator was in the Student Life office from June 21, 2010 to June 24, 2010, when  
11 MCCCCD told Relator that she would be moved from Student Life to its Financial  
12 Aid for a permanent position. Relator refused that move because she was not  
13 qualified for the position in Financial Aid. She was told that if she did not report  
14 to Financial Aid, "it would be a mistake" implying there would be adverse  
15 repercussions.  
16
- 17 78. Relator stayed in Financial Aid for about seven weeks, but was struggling to get a  
18 job description. Her duties and functions were not in keeping with her  
19 compensation or grade level. She was performing filing, general telephone and  
20 other duties typically assigned to student workers. Again Relator complained.  
21 Dr. Paul Dale (PVCC President) told Relator that Bill Hart misspoke and that the  
22 position was only temporary.  
23
- 24 79. On or about July 28, 2010, Lordes Cordez ("Cordez"), MCCCCD Human  
25 Resources representative, called Relator about the temporary assignment as a  
26 Student Services Specialist in the Financial Aid office . Cordez asked whether  
27  
28

1 Relator would accept the temporary assignment. Relator asked what would  
2 happen if she rejected the temporary assignment. Cordez did not know the  
3 answer. Relator called Cordez the next day and rejected the temporary  
4 assignment.  
5

6 80. Relator filed a grievance and continued to work in financial aid.

7 81. The retaliation for reporting illegal conduct had an adverse affect on Relator's  
8 health. She began to experience severe emotional distress and anxiety. Her nurse  
9 practitioner, Sara Huschke, placed her on several medications for high blood  
10 pressure, anxiety, stomach acidity.  
11

12 82. On or about August 25, 2010, Relator took medical leave and was on leave until  
13 October 10, 2010.  
14

15 83. On or about October 10, 2010, Relator returned to work and MCCCCD assigned  
16 her to work in either of two Student Service Specialist positions: 1) Academic  
17 Advising; or 2) Disability Resources. Relator was denied any opportunity to  
18 investigate either position and ultimately chose the position in Academic  
19 Advising where she remains today.  
20

21 **COUNT I**

22 **Defendants Used and Caused Others to Use**  
23 **False Time Records to Get Claims Paid**

24 84. Defendants violated the False Claims Act by having knowingly made, used, or  
25 caused to be made or used, a false record or statement material to a false or  
26 fraudulent claim. 31 U.S.C. § 3729(a)(1)(B).  
27  
28

1 85. Defendant MCCCCD knowingly used false records or statements, including false  
2 timecards, in order to get a false or fraudulent claim paid or approved by the  
3 government. The use of false information to receive financial benefit from the  
4 government is a violation of the FCA. Specifically:

- 5
- 6 a. MCCCCD used and caused students to submit timecards with exaggerated  
7 and false times for service under Project Ayuda;
  - 8 b. MCCCCD used and caused Nursing students to submit timecards for work  
9 in nursing that does not qualify for Project Ayuda;
  - 10 c. MCCCCD used and caused work study students to submit paid work hours  
11 to Project Ayuda.
- 12

13 86. Defendant Dr. Vaughn knowingly caused MCCCCD to use false records or  
14 statements, including false timecards, in order to get a false or fraudulent claim  
15 paid or approved by the government.

16

17 87. The use of false statements in timecards was material because they had the  
18 potential effect, or natural tendency, to increase the amount the federal  
19 government would pay under the AmeriCorps program.

20

21 88. As a direct and proximate result of the false statements, the United States paid  
22 more AmeriCorps education award money than it otherwise would have.

23 WHEREFORE, Relator Christine Hunt prays that:

- 24
- 25 a. Defendants each be assessed a civil penalty of not less than \$5,500 and not  
26 more than \$11,000 for each false statement, including timecard used or  
27 caused to be used in violation of the False Claims Act;
- 28

- 1 b. Defendants each be held jointly and severally liable for three times the  
2 actual damages suffered by the Federal Government as a result of the  
3 Defendants' violations of the False Claims Act;  
4  
5 c. Relator be awarded between 15% per cent and not more than 30% per cent  
6 of any proceeds resulting from this action or any resulting settlement,  
7 pursuant to 31 U.S.C. § 3730(d);  
8  
9 d. Defendants each be assessed jointly and severally an additional sum for all  
10 expenses of litigation incurred in this action, including reasonable  
11 attorneys' fees;  
12  
13 e. Any and all other relief as the Court deems just and proper.

## COUNT II

### Retaliation

- 14  
15  
16 89. Relator complained both internally and to appropriate regulatory agencies  
17 regarding the impropriety of Defendants' schemes. As demonstrated above,  
18 Relator was retaliated against for doing so. Specifically, she was moved from  
19 position to position and had her job functions taken from her in retaliation for  
20 protected activities, including investigating and opposing fraudulent practices by  
21 Defendants in violation of the anti-retaliation provisions of the FCA, 31 U.S.C. §  
22 3730(h).  
23

24 WHEREFORE, Relator Christine Hunt prays that:

- 25  
26 a. Relator be awarded all damages and any other compensatory amounts  
27 necessary to make Relator whole from Defendant's retaliation pursuant to  
28 31 U.S.C. § 3730(h);

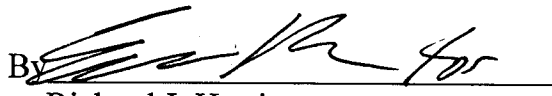


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- b. Defendants be ordered to reinstate Relator to the position she would have enjoyed but for the retaliation;
- c. Defendants each be assessed jointly and severally an additional sum for all expenses of litigation incurred in this action, including reasonable attorney's fees; and
- d. Any and all other relief as the Court deems just and proper.

SUBMITTED: November 15, 2011.

HARRIS & ASSOC., P.C.

By   
Richard J. Harris

ROBAINA & KRESIN, PLLC

By   
Edmundo P. Robaina

Attorneys for Plaintiff-Relator

**SEALED**

JS 44 (Rev. 12/07)

**CIVIL COVER SHEET**

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

**I. (a) PLAINTIFFS**

United States, ex rel., Christine Hunt

(b) County of Residence of First Listed Plaintiff Maricopa  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

Richard J. Harris, Harris & Assoc. PC, 4204 Timbercreek Cir.,  
Roswell, GA 30076 (678) 733-1408

**DEFENDANTS**

Maricopa County Community College District; Dr. Paula Vaughn and Richard Vaughn, husband and wife

County of Residence of First Listed Defendant Maricopa  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

Attorneys (If Known)

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff
- 2 U.S. Government Defendant
- 3 Federal Question (U.S. Government Not a Party)
- 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   |                            |                            |  |                            |                            |
|---|----------------------------|----------------------------|--|----------------------------|----------------------------|
|   | <b>PTF</b>                 | <b>DEF</b>                 |  | <b>PTF</b>                 | <b>DEF</b>                 |
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated <i>or</i> Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated <i>and</i> Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation   | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury  <b>PERSONAL INJURY</b> <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability  <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157  <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark  <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395f) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))  <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input checked="" type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS		
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 510 Motions to Vacate Sentence <b>Habeas Corpus:</b> <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act  <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	

**V. ORIGIN**

(Place an "X" in One Box Only)

- 1 Original Proceeding
- 2 Removed from State Court
- 3 Remanded from Appellate Court
- 4 Reinstated or Reopened
- 5 Transferred from another district (specify)
- 6 Multidistrict Litigation
- 7 Appeal to District Judge from Magistrate Judgment

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

31 USC 3729, et seq  
 Brief description of cause:  
 Violation of the False Claims Act (qui tam action)

**VII. REQUESTED IN COMPLAINT:**

CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

**DEMAND \$** \_\_\_\_\_ **CHECK YES only if demanded in complaint:**

**JURY DEMAND:**  Yes  No

**VIII. RELATED CASE(S) IF ANY**

(See instructions): JUDGE \_\_\_\_\_ DOCKET NUMBER \_\_\_\_\_

DATE

11/15/2011

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_