

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**COMPLAINT FOR QUI TAM FALSE CLAIMS ACT**

Case No. \_\_\_\_\_

**FILED UNDER SEAL UNTIL MAY 22<sup>nd</sup>, 2025**

---

**PRO SE RELATORS:**

**TIMOTHY V. SHINDELAR,  
GREGORY STENSTROM,  
CHRISTINE I. HEITMAN,  
ROBERT C. MANCINI,  
JANE AND JOHN DOES 1-750,**

Plaintiffs,

v.

**MICHAEL E. HOROWITZ, WILLIAM P. BARR, JAMES R. McHENRY III,  
MERRICK GARLAND, JEFFREY R. RAGSDALE, LISA O. MONACO, JOHN  
L. SMITH, ROD J. ROSENSTEIN, CHRISTOPHER A. WRAY, MATTHEW J.  
VAETH, RICHARD P. DONOGHUE, NICHOLE M. ARGENTIERI, KEVIN O.  
DRISCOLL, JOHN C. DEMERS, CORY R. AMUNDSON, DAVID L.  
BOWDICH, JOSEPH P. COONEY, MOLLY GULLAND GASTON,  
ELIZABETH B. PRELOGAR, JAMES I. PEARCE, JOHN M. PELLETTIERI,  
MARK S. MASLING, JONATHAN P. HOOKS, GREGG A. MAISEL,  
ELIZABETH ALOI, JOHN D. KELLER, RICHARD C. PILGER, MARK  
COHEN, BRIDGET M. FITZPATRICK, DENISE CHEUNG, JENNIFER L.  
BLACKWELL, JACQUELINE C. ROMERO, WILLIAM M. McSWAIN,  
NELSON S.T. THAYER, JR., GREGORY B. DAVID, RICHARD P. BARRETT,  
WAYNE A. JACOBS, THOMAS HICKS, CHRISTINE E. SYKES, SUSAN R.  
BECKER, BENJAMIN W. HOVLAND, DONALD L. PALMER, CHRISTY A.  
McCORMICK, ALBERT SCHMIDT, BRIANNA M. SCHLETZ, SARA E.  
DRYER, NORMAN Y. WONG, STACEY M. LUDWIG, CHARLENE KELLER  
FULLMER, THOMAS R. PERRICONE, CATHERINE S. BRUNO, AARON S.  
JUCKNIESS, KIMBERLY A. FRANKLIN, HAMPTON Y. DELLINGER,  
BRIAN C. RABBITT, ERIC S. DREIBAND, GREGORY F. DEMBSKI, DEBRA  
M. BROOKS, ROBERT J. HEBERLE, ADAM J. MILES, ANN CALVARESI  
BARR, STEVEN A. LINICK, GLENN A. FINE, JENNIFER A. WILLIAMS,**

DALE A. CHRISTOPHER, DIERDE A. HARRISON, HENRY J. KERNER, MYRON MARLIN, ANNALOU T. TIROL, STACEY L. HARWOOD, RAYMOND N. HULSER, MICHAEL R. DREEBEN, THOMAS P. WINDOM, JAMES M. PEARCE, DAVID M. RODY, MICHAEL E. THAKUR, CECIL W. VANDEVENDER, DAVID RASKIN, BRETT REYNOLDS, DAVID V. HARBACH, GREGORY D. BERSTEIN, MATTHEW BURKE, JAY I. BRATT, KATHRYN L. RAKOCZV, BRIANNA M. SCHLETZ, NJERI S. HANES, DANIEL GRIESER, COREY F. ELLIS, BRIAN C. MIZER, TIMOTHY A. DUREE, J. MICHAEL KELLY, JULIE A. EDELSTEIN, KAREN E. GILBERT, JONATHAN W. HARAY, MARY L. DOHRMAN, ANNA P. MCNAMARA, ERIC L. GIBSON, KIRK D. HANDRICH, STEVEN A. STEBBINS, KAREN P. GORMAN, SUSAN K. ULLMAN, ELLEN CHUBIN EPSTEIN, LOUIS LOPEZ, ANNE M. WAGNER, TRISTAN L. LEAVITT, DEBRAH J. JEFFREY, MARK L. GREENBLAT, ANDREW KATSAROS, ATTICUS J. REASER, ALLISON C. LERNER, CAROLYN N. LERNER, KEVIN H. WINTERS, ROBERT P. STORCH, STEVEN A. STEBBINS, MARGUERITE C. GARRISON, JAMES R. IVES, CATHERINE M. DELPRETE VUONO, QUINTON A. BRADY.

Defendants.

---

COMPLAINT FOR VIOLATIONS OF 42 U.S.C. §§ 1983, 1985, 1986, AND QUI TAM FALSE CLAIMS ACT

---

I. INTRODUCTION

1. This is an action for declaratory and injunctive relief, compensatory damages, and statutory penalties under the **Qui Tam False Claims Act (31 U.S.C. §§ 3729-3733), 42 U.S.C. §§ 1983, 1985, and 1986**, brought by Relators against the Defendants, who are all federal officials acting under the color of law, and incorporates the attached Memorandum of Law and Certificate of Service under seal pursuant to **31 U.S.C. § 3730(b)(2)**.
2. Defendants engaged in a **pattern of fraud, misrepresentation, abuse of power, and constitutional violations**, resulting in direct harm to Relators and the **United States Government**.
3. The Relators, as private citizens and **federal whistleblowers**, bring this action on behalf of the **United States** to recover damages and penalties for fraudulent and unlawful conduct by the Defendants.

---

## II. JURISDICTION, VENUE, AND SEALING REQUIREMENTS

1. This Court has **jurisdiction** pursuant to:
  - **28 U.S.C. § 1331** (Federal Question Jurisdiction).
  - **28 U.S.C. § 1343** (Civil Rights and Conspiracy Violations).
  - **31 U.S.C. § 3732** (False Claims Act Jurisdiction).
  - **42 U.S.C. §§ 1983, 1985, and 1986** (Civil Rights & Conspiracy Violations).
  - **18 U.S.C. §§ 1510, 1505, 242** (Obstruction and Deprivation of Rights Statutes).
2. **Venue** is proper under **28 U.S.C. § 1391(b)** because:
  - Defendants engaged in **fraudulent conduct within the District of Columbia**.
  - False claims were **processed, submitted, or concealed** in this jurisdiction.
  - Key decision-making actions **occurred at agencies headquartered in D.C.**

---

## III. SEALING REQUIREMENTS:

1. Pursuant to **31 U.S.C. § 3730(b)(2)**, this **Qui Tam Complaint must be filed under seal for at least 60 days**, during which time **Defendants shall not be served** until ordered by the Court. Relators acknowledge and comply with all **D.C. District Local Rules** regarding Qui Tam filings, ensuring proper procedural adherence.

---

## IV. RELATORS' "ORIGINAL SOURCE" STATUS

Relators qualify as an "**original source**" under **31 U.S.C. § 3730(e)(4)** because:

1. They **have direct and independent knowledge of the fraudulent conduct** described in this Complaint.

2. Their information was **not previously publicly disclosed or, if partially disclosed, Relators have provided new, material details to expose ongoing fraud.**
3. They have **voluntarily provided this information to the U.S. Government before filing this lawsuit.**

---

## V. MATERIAL EVIDENCE PROVIDED TO THE GOVERNMENT

Relators have disclosed the following categories of material evidence:

1. **Whistleblower Disclosures Previously Submitted:** Documentation previously provided to **federal oversight bodies** detailing Defendants' misconduct.
2. **Serialized disclosures and critical correspondence and records have also been entered into the National Archives** to ensure the ability of the US Department of Justice can retrieve them in the event of spoliation.
3. **Witness Statements:** Testimonies from **government officials and private-sector employees** who were instructed to alter or suppress material information.
4. **Emails and Memoranda:** Communications among Defendants coordinating the **submission of false claims** to secure federal disbursements.
5. **Official Grant and Funding Documents:** Evidence that Defendants **falsified certifications** to receive federal funds unlawfully.
6. **Internal Government Correspondence:** Documents showing **deliberate misrepresentation** of federal funding allocations.
7. **Financial Records and Invoices:** Demonstrating **misuse and redirection** of federal funds in contradiction to statutory requirements.

Relators have provided all material evidence in their possession and **will continue cooperating with the United States Government** in its investigation.

---

## VI. DOJ INTERVENTION & ALTERNATIVE REMEDIES

1. Under 31 U.S.C. § 3730(b)(4), the United States Government has **60 days from the date of service to notify the Court** whether it elects to

intervene or declines intervention, in which case **Relators will proceed with the action.**

2. Pursuant to **31 U.S.C. § 3730(c)(5)**, if the Government chooses to pursue alternative remedies (such as administrative proceedings, settlement negotiations, or enforcement actions), **Relators reserve their right to a share of any recovery obtained by the Government.**
3. In accordance with **31 U.S.C. § 3730(b)(2)**, a **copy of this Complaint and a written disclosure of all material evidence and information in Relators' possession have been served upon the Attorney General of the United States and the United States Attorney for the District of Columbia.**

---

## **VII. PARTIES**

### **A. RELATORS (Plaintiffs):**

1. **TIMOTHY V. SHINDELAR, GREGORY STENSTROM, CHRISTINE I. HEITMAN, ROBERT MANCINI, JOHN DOES (1-500) and JANE DOES (1-250)** are **federal whistleblowers** with firsthand knowledge of the **fraudulent schemes and constitutional violations** committed by Defendants.

### **B. DEFENDANTS**

1. **MICHAEL E. HOROWITZ – U.S. Department of Justice Inspector General (DOJ-IG)**
2. **WILLIAM P. BARR – Former U.S. Attorney General**
3. **JAMES R. McHENRY III – Acting U.S. Attorney General**
4. **MERRICK B. GARLAND – Former U.S. Attorney General**
5. **JEFFREY R. RAGSDALE – DOJ Office of Professional Responsibility (OPR) Counselor**
6. **LISA O. MONACO – U.S. Deputy Attorney General (DAG)**
7. **JOHN L. SMITH – Appointed DOJ Special Counsel (5559-2022)**

8. **ROD J. ROSENSTEIN – Former U.S. Deputy Attorney General (DOJ)**
9. **CHRISTOPHER A. WRAY – Former FBI Director**
10. **MATTHEW J. VAETH – Acting Director, Office of Management and Budget (OMB)**
11. **RICHARD P. DONOGHUE – Principal Associate Deputy Attorney General (PADAG)**
12. **NICHOLE M. ARGENTIERI – Acting Assistant Attorney General, Criminal Division (CRM)**
13. **KEVIN O. DRISCOLL – Deputy Assistant Attorney General, Criminal Division (CRM)**
14. **JOHN C. DEMERS – Former Assistant Attorney General, National Security Division (NSD)**
15. **CORY R. AMUNDSON – Chief, DOJ Public Integrity Section (PIN)**
16. **DAVID L. BOWDICH – Former Deputy Director, FBI**
17. **JOSEPH P. COONEY – Deputy Special Counsel to Special Counsel John L. Smith (559-2022)**
18. **MOLLY GULLAND GASTON – Senior Assistant Special Counsel to Special Counsel John L. Smith (559-2022)**
19. **ELIZABETH B. PRELOGAR – Former U.S. Solicitor General**
20. **JAMES I. PEARCE – Assistant Special Counsel to Special Counsel John L. Smith (559-2022)**
21. **JOHN M. PELLETTIERI – Assistant Special Counsel to Special Counsel John L. Smith (559-2022)**
22. **MARK S. MASLING – Chief, DOJ Professional Misconduct Review Unit (PMRU)**
23. **JONATHAN P. HOOKS – Chief, Fraud Section, DOJ Criminal Division (CRM)**
24. **ELIZABETH ALOI – Public Corruption Prosecutor, U.S. Attorney Office (USAO), District of Columbia (USAO-DC)**

25. **JOHN D. KELLER – “Acting” Chief, DOJ Criminal Division Public Integrity Section (PIN)**
26. **RICHARD C. PILGER – DOJ Criminal Division, Election Crimes Branch (ECB)**
27. **MARK COHEN – Deputy Special Counsel, U.S. Special Counsel (OSC)**
28. **BRIDGET M. FITZPATRICK – First Assistant U.S. Attorney, District of Columbia (USAO-DC)**
29. **DENISE CHEUNG – Chief, Fraud Unit, U.S. Attorney Office (USAO-DC)**
30. **GREGG A. MAISEL – Deputy Chief, DOJ Criminal Fraud Section / USAO-DC**
31. **JENNIFER L. BLACKWELL – Deputy Chief, Public Corruption & Civil Rights Unit, DOJ**
32. **JACQUELINE C. ROMERO – U.S. Attorney, Eastern District of Pennsylvania (EDPA)**
33. **WILLIAM M. McSWAIN – Former U.S. Attorney, Eastern District of Pennsylvania (EDPA)**
34. **NELSON S.T. THAYER, JR. – First Assistant U.S. Attorney, Eastern District of Pennsylvania (EDPA)**
35. **GREGORY B. DAVID – Chief, Civil Division, U.S. Attorney Office (USAO) Eastern District of Pennsylvania (EDPA)**
36. **RICHARD P. BARRETT – Criminal Chief, U.S. Attorney Office (USAO) Eastern District of Pennsylvania (EDPA)**
37. **WAYNE A. JACOBS – FBI Special Agent-in-Charge (SAC), Philadelphia Field Office**
38. **THOMAS HICKS – Commissioner, U.S. Election Assistance Commission (EAC)**
39. **CHRISTINE E. SYKES – Deputy Chief, Criminal Division, U.S. Attorney Office (EDPA)**

40. **SUSAN R. BECKER – Deputy Chief, Civil Division, U.S. Attorney Office (EDPA)**
41. **BENJAMIN W. HOVLAND – Chair, U.S. Election Assistance Commission (EAC)**
42. **DONALD L. PALMER – Commissioner, U.S. Election Assistance Commission (EAC)**
43. **CHRISTY A. McCORMICK – Commissioner, U.S. Election Assistance Commission (EAC)**
44. **ALBERT SCHMIDT – Secretary of the Commonwealth of Pennsylvania**
45. **BRIANNA M. SCHLETZ – Executive Director, U.S. Election Assistance Commission (EAC)**
46. **SARAH E. DRYER – Acting Inspector General, U.S. Election Assistance Commission (EAC)**
47. **NORMAN Y. WONG – Acting Director, Executive Office for U.S. Attorneys (EOUSA)**
48. **STACEY M. LUDWIG – Chief, DOJ Professional Responsibility Advisory Office (PRAO)**
49. **THOMAS R. PERRICONE – Deputy Chief, Criminal Division, U.S. Attorney Office (EDPA)**
50. **CATHERINE S. BRUNO – Deputy Director, FBI Office of Integrity and Compliance (FBI-OIC)**
51. **AARON S. JUCKNIESS – Chief, DOJ Special Investigations and Review Unit (SIRU)**
52. **KIMBERLY A. FRANKLIN – Chief, DOJ Professional Misconduct Review Unit (PMRU)**
53. **HAMPTON Y. DELLINGER – U.S. Special Counsel (OSC)**
54. **BRIAN C. RABBITT – Former Acting Assistant Attorney General, Criminal Division (CRM)**
55. **ERIC S. DREIBAND – Former Assistant Attorney General, Civil Rights Division (CRD)**

56. **GREGORY F. DEMBSKI – Assistant Director, DOJ Office of Integrity and Compliance (OIC)**
57. **DEBRA M. BROOKS – Deputy Director, DOJ Office of Professional Responsibility (OPR)**
58. **ROBERT J. HEBERLE – Deputy Director, DOJ Election Crimes Branch (ECB)**
59. **ADAM J. MILES – Senior Counsel to DOJ IG Michael E. Horowitz / Former Acting U.S. Special Counsel (OSC)**
60. **ANN CALVARESI BARR – Former Inspector General, USAID**
61. **STEVEN A. LINICK – Former Inspector General, U.S. State Department**
62. **GLENN A. FINE – Former Acting Inspector General, U.S. Department of Defense (DOD-IG)**
63. **MARGUERITE C. GARRISON – U.S. Department of Defense (DOD-IG), Deputy Inspector General, Administrative Investigations (DOD-IG)**
64. **STEVEN A. STEBBINS – U.S. Department of Defense (DOD-IG), Acting Inspector General, U.S. Department of Defense (DOD-IG)**
65. **JENNIFER A. WILLIAMS – Former First Assistant U.S. Attorney (FAUSA), U.S. Attorney Office (USO), Eastern District of Pennsylvania (EDPA)**
66. **DALE A. CHRISTOPHER – Deputy Director for Compliance, U.S. Office of Government Ethics (OGE)**
67. **DIERDE A. HARRISON – Acting Deputy Director for Management, Office of Management and Budget (OMB)**
68. **SCOTT S. DAHL – Former Inspector General, Department of Labor (DOL-IG) / Chair CIGIE Integrity Committee (IC)**
69. **KEVIN H. WINTERS – Inspector General, Amtrak / Chair CIGIE Integrity Committee (IC)**
70. **KIMBERLY A. HOWELL – Inspector General, Corporation for Public Broadcasting (CPB)**

71. **BRIAN M. TOMNEY – Inspector General, Federal Housing Finance Agency (FHFA-IG)**
72. **HENRY J. KERNER – Member, Merit System Protection Board (MSPB) / Former U.S. Special Counsel**
73. **ELLEN CHUBIN EPSTEIN – General Counsel, OPM-IG / Former Principal Deputy U.S. Special Counsel (OSC)**
74. **TRISTAN L. LEAVITT – Former MSPB Member / Former Acting U.S. Special Counsel (OSC)**
75. **KAREN P. GORMAN – Acting U.S. Special Counsel / Principal Deputy Special Counsel (PDSC), U.S. Special Counsel (OSC)**
76. **MYRON MARLIN – DOJ Spokesperson to Special Counsel John L. Smith (559-2022)**
77. **ANNALOU T. TIROL – Chief Counsel, DOJ Criminal Division (CRM), Public Integrity Section (PIN)**
78. **ANNE M. WAGNER – Federal Labor Relations Authority (FRLA) / Former Associate Special Counsel, U.S. Special Counsel (OCS)**
79. **STACEY L. HARWOOD – Deputy Director, DOJ Civil Rights Division (CRD)**
80. **RAYMOND N. HULSER – Counselor to Special Counsel John L. Smith (559-2022)**
81. **MICHAEL R. DREEBEN – Counselor to Special Counsel John L. Smith (559-2022)**
82. **THOMAS P. WINDOM – Senior Assistant Special Counsel John L. Smith (559-2022)**
83. **JAMES M. PEARCE – Assistant Special Counsel John L. Smith (559-2022)**
84. **DAVID M. RODY – Assistant Special Counsel John L. Smith (559-2022)**
85. **MICHAEL E. THAKUR – Assistant Special Counsel John L. Smith (559-2022)**

86. **CECIL W. VANDEVENDER – Assistant Special Counsel John L. Smith (559-2022)**
87. **DAVID RASKIN – Assistant Special Counsel John L. Smith (559-2022)**
88. **BRETT REYNOLDS – Assistant Special Counsel John L. Smith (559-2022)**
89. **DAVID V. HARBACH – Assistant Special Counsel John L. Smith (559-2022)**
90. **GREGORY D. BERSTEIN – Assistant Special Counsel John L. Smith (559-2022)**
91. **MATTHEW BURKE – Assistant Special Counsel John L. Smith (559-2022)**
92. **JAY I. BRATT – Assistant Special Counsel John L. Smith (559-2022)**
93. **KATHRYN L. RAKOCZV – Chief, Fraud Unit, U.S. Attorney Office (USAO-DC)**
94. **CHARLENE KELLER FULLMER – Deputy Chief, Civil Division, U.S. Attorney Office (USAO), Eastern District of Pennsylvania (EDPA)**
95. **NJERI S. HANES – DOJ Professional Responsibility Advisory Office (PRAO)**
96. **COREY F. ELLIS – Former Acting Director, DOJ Executive Office of U.S. Attorneys (EOUSA)**
97. **BRIAN C. MIZER – Acting Associate Attorney General**
98. **TIMOTHY A. DUREE – Assistant Special Counsel John L. Smith (559-2022)**
99. **J. MICHAEL KELLY – Senior Counsel, Cooley LLP**
100. **JULIE A. EDELSTEIN – Assistant Special Counsel John L. Smith (559-2022)**
101. **KAREN E. GILBERT – Assistant Special Counsel John L. Smith (559-2022)**

102. **JONATHAN W. HARAY – Assistant Special Counsel John L. Smith (559-2022)**
103. **MARY L. DOHRMAN – Assistant Special Counsel John L. Smith (559-2022)**
104. **ANNA P. MCNAMARA – Assistant Special Counsel John L. Smith (559-2022)**
105. **ERIC L. GIBSON – Assistant Special Counsel John L. Smith (559-2022)**
106. **KIRK D. HANDRICH – DOJ Civil Rights Division (CRD)**
107. **SUSAN K. ULLMAN – General Counsel, U.S. Office of Special Counsel (OSC)**
108. **LOUIS LOPEZ – Chief, Policy and Strategy Section, DOJ Civil Rights Division / Associate Special Counsel (ASC), U.S. Special Counsel (OSC)**
109. **DEBRAH J. JEFFREY – Inspector General, AmeriCorps / Vice-Chair, CIGIE Integrity Committee**
110. **MARK L. GREENBLAT – Inspector General, Department of the Interior / Former chair CIGIE**
111. **ANDREW KATSAROS – Inspector General, Federal Trade Commission (FTC) / CIGIE Integrity Committee Member**
112. **ATTICUS J. REASER – General Counsel, CIGIE**
113. **ALLISON C. LERNER – Inspector General, National Science Foundation (NSF) / Former Chair, CIGIE**
114. **CAROLYN N. LERNER – Judge, U.S. Court of Federal Claims / Former U.S. Special Counsel (OSC)**
115. **ROBERT P. STORCH – Inspector General, U.S. Department of Defense (DOD-IG)**
116. **QUINTON A. BRADY – Assistant General Counsel, GSA Inspector General / Former Senate Homeland Security and Governmental Affairs INVESTIGATOR (Sen, Charles E. Grassley)**

**117. MICHAEL J. RIGAS – Deputy Secretary of State for Management and Resources / Former OMB Deputy Director / CIGIE Executive Chairperson**

These defendants **orchestrated and enforced** policies within the DOJ and federal oversight bodies that **systematically obstructed fraud investigations, manipulated enforcement actions, and weaponized government mechanisms against whistleblowers** who sought to expose corruption. Their actions **not only facilitated financial misconduct at the highest levels of government but also ensured brutal reprisals against those who petitioned the government for redress of grievances**, including fraud, waste, abuse, and systemic civil rights violations. By **blocking investigations, suppressing whistleblower disclosures, and shielding fraudulent activities from scrutiny**, these defendants created an environment where corruption thrived unchecked. Their deliberate suppression of oversight mechanisms and **targeted retaliation against whistleblowers** constitute a direct assault on the rule of law, requiring **immediate legal intervention and accountability** under the False Claims Act, obstruction statutes, and civil rights protections.

---

## **IX. FACTUAL BACKGROUND**

1. Relators provided **documented disclosures** to federal agencies, exposing **widespread fraud, civil rights violations, and misuse of federal funds**.
2. Defendants knowingly engaged in **acts of misrepresentation, document falsification, obstruction of justice, and unconstitutional deprivation of due process**, including but not limited to:
  - a. **Retaliation (intentional action taken against U.S. citizens for engaging in Constitutionally protected activity) disclosing wrongdoing.**
  - b. **Suppressing material evidence.**
  - c. **Fraudulent certifications related to federal funding.**
  - d. **Collusion to interfere with constitutional rights under 42 U.S.C. § 1985.**

3. The Defendants' conduct resulted in **direct financial harm** to the **United States Government** and deprived Relators and other citizens of their **constitutionally protected rights**.
- 

## **IX. CAUSES OF ACTION**

### **A. COUNT ONE: VIOLATION OF 42 U.S.C. § 1983 (DEPRIVATION OF RIGHTS)**

1. Relators reallege and incorporate all previous paragraphs as if fully stated herein.
2. Defendants, acting under **color of law**, deprived Relators and others of their **constitutional rights**.
3. As a **direct and proximate result** of Defendants' unlawful conduct, Relators suffered **economic loss, emotional distress, reputational harm, and due process violations**.

### **B. COUNT TWO: CONSPIRACY TO INTERFERE WITH CIVIL RIGHTS (42 U.S.C. § 1985)**

1. Defendants conspired to **obstruct justice, suppress evidence, and retaliate against whistleblowers**.
2. Defendants engaged in **coordinated actions to mislead federal agencies, courts, and the public**, depriving Relators and others of their civil rights.
3. Relators seek **compensatory damages and injunctive relief** to prevent further violations.

### **C. COUNT THREE: FALSE CLAIMS ACT VIOLATIONS (31 U.S.C. §§ 3729-3733)**

1. Defendants knowingly presented **false claims** and made **material misrepresentations** in **federal funding applications and certifications**.
  2. As a result, the **United States Government** incurred **financial losses**, and Relators seek **treble damages and statutory penalties** under the **Qui Tam provisions of the False Claims Act**.
-

## X. LIST OF MATERIALS

1. Pursuant to **31 U.S.C. § 3730(b)(2)**, all supporting evidence and disclosures referenced in this Qui Tam action are fully documented and incorporated as **Exhibits in the attached Memorandum of Law**. These exhibits substantiate claims of fraudulent activities, obstruction of justice, and violations of federal law.

---

## XI. PRAYER FOR RELIEF

WHEREFORE, Relators respectfully request that this Court grant the following relief:

WHEREFORE, the Relators respectfully request this Honorable Court:

1. **Accept jurisdiction** over this Qui Tam action pursuant to 31 U.S.C. § 3730(b);
2. **Permit service of process** on Defendants upon expiration of the seal period or upon order of the Court;
3. **Grant leave for the United States to intervene** or elect not to intervene pursuant to 31 U.S.C. § 3730(b)(4);
4. **Impose civil penalties**, treble damages, and restitution against all Defendants found liable under the False Claims Act (31 U.S.C. §§ 3729–3733);
5. **Declare unlawful and enjoin** any acts of retaliation or obstruction of protected disclosures by Relators, pursuant to 31 U.S.C. § 3730(h) and 42 U.S.C. §§ 1983, 1985, and 1986;
6. **Grant equitable relief** as necessary to prevent further harm to whistleblowers, including reinstatement, restoration of clearances, or public correction of defamatory allegations;
7. **Award Relators their share** of any recovered funds as provided under 31 U.S.C. § 3730(d), including attorneys' fees and costs, notwithstanding pro se status;
8. **Order such other relief** as the Court deems just and proper in the interest of justice and accountability.

## XII. JURY DEMAND

1. Relators demand a **full trial by jury** on all issues triable by right.
- 

## XII. CONCLUSION

1. This **Disclosure Statement**, filed under seal, fully complies with the requirements of **31 U.S.C. § 3730(b)(2)**. Relators affirm that all known material evidence has been provided and **stand ready to supplement this disclosure upon request from the United States Government**.
- 

Respectfully submitted,



**Dr. Timothy V. Shindelar, Pro Se**

1390 Chain Bridge Road

McLean VA 22101;

[Shindelar@proton.me](mailto:Shindelar@proton.me)

571-344-8762



**Gregory Stenstrom, Pro Se**

1541 Farmers Lane

Glen Mills, PA 19342

[gstenstrom@xmail.net](mailto:gstenstrom@xmail.net)

856-264-5495



**Christine I. Heitman, Pro Se**

1521 North Hunters Court

Bensalem, PA 19020

[christine.heitman@protonmail.com](mailto:christine.heitman@protonmail.com)

215-791-0682



**Robert C. Mancini, Pro Se**

4 Guernsey Lane

Media, PA, 19063

[robcmancini@gmail.com](mailto:robcmancini@gmail.com)

610-506-9827

## **PRO SE RELATORS**

**DATE: March 24<sup>th</sup>, 2025.**

---

### **Served Upon:**

- **Attorney General of the United States**
- **United States Attorney for the District of Columbia**

**Filed Under Seal – Not to be Served on Defendants until May 22<sup>nd</sup>, 2025.**