

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA

CASE NO. CIA 87-0342-A

Eldridge Cleaver,  
Susan M. Thompson,  
Harold Goode dba  
The Original Four,  
Ethan M. Sones,  
Federation for American Afghan  
Action,  
American Afghan Education Fund,  
Andrew L. Eiva,  
John C. Houston,  
on behalf of themselves and all  
other persons similarly  
situated,

Plaintiffs

v.

Howard J. Ruff,  
Neal B. Blair,  
Mark J. Stoddard,  
Robert Stratford,  
Robert Allen,  
William Jacobs,  
Daniel R. Flynn,  
Marilyn Price  
Free the Eagle, Inc.  
Ruff Political Action  
Committee,  
American Heritage Centre,  
Neal Blair Company,  
Ruff Political Action  
Committee State Fund,  
Howard J. Ruff Foundation  
for Economic and Financial  
Education,  
Millennial Star Foundation,  
Target Publishers, Inc.,  
Financial Publishers of  
America,  
and all other  
persons similarly situated,

Defendants

COMPLAINT  
FOR RICO CONSPIRACY, CLASS  
ACTION, INJUNCTIVE RELIEF,  
etc.

