

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

PUERTO RICO SOCCER LEAGUE NFP CORP.,
a Puerto Rico for profit corporation,
JOSEPH MARC SERRALTA IVES, an individual
MARIA LARRACUENTE,
JUAN M. CORNEJO,
JOSE R. OLMO-RODRIGUEZ,
FUTBOL BORICUA (FBNET), Inc.,

Plaintiffs,

v.

FEDERACION PUERTORRIQUENA DE
FUTBOL, INC.,
IVAN RIVERA-GUTIERREZ,
JOSE “CUKITO” MARTINEZ,
GABRIEL ORTIZ,
LUIS MOZO CANETE,
JOHN DOE 1-10,

Defendants.

CIVIL ACTION NO. 23- ()

COMPLAINT FOR DAMAGES AND
INJUNCTIVE RELIEF FOR RICO ACT
VIOLATIONS AND DEMAND FOR
JURY TRIAL

COMPLAINT

TO THE HONORABLE COURT:

COME NOW the Plaintiffs, represented by the undersigned counsel and very respectfully
ALLEGE, SET FORTH and PRAY:

Nature of the Case

1. Plaintiffs, all soccer industry professionals, complain of a scheme perpetrated by all
Defendants, all part of soccer’s federative arm in Puerto Rico, to block the Plaintiffs from
conducting soccer operations, or business, in Puerto Rico, starting in 2019, and ongoing in nature.

2. Plaintiffs bring this civil action to rectify Defendants' violations of the Federal Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. § 1964 ("RICO"). Defendants are advancing a scheme to defraud Plaintiffs of money, property, and benefits of monetary value.

3. Plaintiffs reserve the right to amend and include antitrust claims pursuant to the Sherman Act and Clayton Act, for the Federation's, and its co-defendants', restraint of trade of Plaintiffs, and its monopolization, attempted monopolization, conspiracy, or combination to monopolize, injuring Plaintiffs PRSL, Serralta, Cornejo, Larracuente and Olmo.

PARTIES

Plaintiffs

4. Plaintiff PUERTO RICO SOCCER LEAGUE NFP CORP. ("PRSL") is a Puerto Rico for profit corporation in operation since 2008, until Defendants' interference in 2019.

5. Plaintiff Joseph Marc "Joey" Serralta Ives is *sui juris* and owner, Chairman and President of PRSL, and domiciled in Houston, Texas. Joey Serralta is a member of the Puerto Rico Soccer Hall of Fame ("Salon de la Fama del Futbol"), founder of the Puerto Rico Islanders F.C. and Houston Hurricanes, F.C. (precursor to the MLS's Houston Dynamo), member of the United Nations Sports for Climate Action and United Nations Football for the Goals, advancing PRSL's goals worldwide and implementing United Nations' climate action initiatives in Puerto Rico through the massification of the sport via the construction of the SafeStadium concept in ten (10) municipalities in Puerto Rico.

6. Plaintiff Juan M. Cornejo ("Cornejo") is the longest tenured member of the Federation's ("FPF") Board of Directors, having served two four-year terms and now serving a third four-year term. Cornejo also founded, owned and operated the "Liga Elite, Inc." ("Liga Elite") which for the past decade has run the main amateur soccer leagues and tournaments in Puerto Rico comprising

thousands of children of both sexes and all ages from all over Puerto Rico. Liga Elite historically has operated in the facilities of the Bayamon Soccer Club, Inc. (“Bayamon”), and is, therefore, commonly known as the “Liga de Bayamon”. Cornejo sold the company but remained as League Director. Cornejo was also a coach for Bayamon before founding Liga Elite. Since January 2022, the Federation suspended him from all soccer related activities, including his position in the board of directors of the Federation and for a term of 4 years.

7. Plaintiff Maria Larracuente is an administrative member of Bayamon’s administrative staff, as well as past member of the Federation’s Board of Directors and CONCACAF game commissioner and venue manager. She was the leading candidate for the FPF presidency, yet the FPF illegally blocked her candidacy for President in the March 2023 federative elections.

8. Plaintiff Jose R. Olmo-Rodriguez (“Olmo”) was the President of “Pumas de Roosevelt Futbol Club, Inc. (“PRFC”). Plaintiff Olmo is also a lawyer and as such represented Plaintiff Cornejo and other persons before the Federation’s Discipline and Ethics Commission and Appellate Commission. He was suspended from the Federation for providing legal representation to Plaintiff Cornejo and others. PRFC participates in Liga Elite.

9. Plaintiff Futbol Boricua (FBNET), Inc., is a non-profit corporation registered in Puerto Rico and the island’s top soccer media source since 2011, responsible for publishing soccer news, scores, opinions, interviews and editorials, some critical of Defendants FPF and Ivan Rivera Gutierrez. In 2019, it entered into an agreement with PRSL to transmit live all its games, invested in audiovisual equipment and personnel and spent time preparing, and announced its plan and intentions before the start of the 2019-2020 League.

Defendants

10. Defendant Federación Puertorriqueña de Fútbol (“FPF”), or Puerto Rico Soccer Federation, is the island’s soccer federative body.

11. Defendant Ivan E. Rivera-Gutiérrez is the President of the Federation (“FPF”) since March 2019. Before becoming President, he was the President of the Corozal Soccer Club, Inc. and Executive Director of the “Liga Central” which is another amateur league. He communicated via email and mail with FIFA and CONCAAF to advance the conspiracy and monopolistic practices.

12. Defendant Jose “Cukito” Martinez is a Vice President of the Federation (“FPF”) since March 2019. Before becoming Vice President, he operated the Escuela de Fútbol Taurinos de Cayey, Inc., and in late 2018 and early 2019 met with members of PRSL and the Mayor of Cayey to discuss his role in managing one of the ten clubs that PRSL was going to operate in the 2019-2020 season, and discussed with PRSL its SafeStadium concept and business plan of expansion and massification.

13. Defendant Gabriel Ortiz is the Secretary General of the Federation (“FPF”) who sent most of the email communications made throughout this conspiracy to Plaintiffs to advance the conspiracy and monopolistic practices.

14. Defendant Luis Mozo Cañete is the Auxiliary Secretary of the Federation.

15. Defendants John Doe 1-10 are individuals or corporate entities responsible for the damages suffered by the Plaintiffs, whose identities are unknown at this moment.

JURISDICTION AND VENUE

16. The Court has jurisdiction under 28 U.S.C. § 1331. Plaintiffs’ RICO claims present federal questions.

17. Venue is proper in the District of Puerto Rico. The Federation is located geographically within the territory of Puerto Rico. A substantial part of the events, or omissions, giving rise to

Plaintiffs' claims occurred in Puerto Rico. 28 U.S.C. §1391(a)(2). Defendants transacted their affairs in Puerto Rico. 18 U.S.C. §1965(a).

18. Plaintiffs further invoke the supplemental jurisdiction of the Court pursuant to 28 U.S.C. § 1367, to hear and decide claims arising from the same nucleus of operative facts, that arise under the Constitution and laws of the Commonwealth of Puerto Rico.

FACTUAL BACKGROUND

Puerto Rico Soccer League and Joseph Marc Serralta Ives

19. Plaintiff, Puerto Rico Soccer League operated Puerto Rico's top soccer league, ("*LigaPro*®" or "the League"), since 2008.¹ It had operated with the authorization of Defendant, the Puerto Rico Soccer Federation, or Federación Puertorriqueña de Fútbol ("FPF"), which annually issued its "aval" (in Spanish) or affiliation. The collapse of Puerto Rico's economy, starting in 2004, and the collapse of Puerto Rico's infrastructure as a consequence of Hurricane Maria on September 20, 2017², which left the island without electrical power for one year, caused the League to see its 2018-2019 season disrupted and suspended, while management addressed the lack of availability of soccer fields (pitches) where to play due to the devastation caused by the storm, the human exodus that followed with over 300,000 islanders moving to the continental U.S., and once it could resume its LigaPro for the 2019-2020 season, it published it.

¹ Puerto Rico's economic challenges are well documented. Annual economic growth fell by roughly 12.5 percent overall between 2004 and 2020, while Puerto Rico's population shrunk by more than 16 percent. It has also struggled under a large public debt in recent years, totaling about \$70 billion—or 68 percent of gross domestic product (GDP)—in 2020. Puerto Rico's downward spiral has been compounded by natural disasters, government mismanagement and corruption, and the COVID-19 pandemic. See <https://www.cfr.org/background/puerto-rico-us-territory-crisis>

² Hurricane Maria. See <https://www.climate.gov/news-features/understanding-climate/hurricane-marias-devastation-puerto-rico>

20. On August 29, 2018, the Puerto Rico Soccer League (“PRSL”) held a Gala and Presentation of its PRSL 2.0 Business Plan at Vivo Beach Club, in San Juan.³ Hundreds attended, including FPF members of the administration that preceded the current administration, and also including members of the present administration.

21. PRSL’s Business Plan was announced to the island’s soccer community, and soon thereafter, the 2019-2020 Season Itinerary was published. It would commence Saturday, October 12, 2019; it would conclude Sunday, May 31, 2020. Seven clubs, twenty eight dates, to bring back top soccer to Puerto Rico, after a calamitous recovery period following Hurricane Maria.⁴

22. By early 2019, the Federation did not own or operate any soccer league or tournament.

23. By early 2019, PRSL and “Liga Elite, Inc.” owned and operated the main soccer leagues and tournaments.

24. By early 2019, Defendant Rivera was running for president of the Federation against Alberto Santiago, who was, at that moment, vice president of the Federation and President of the Bayamon Soccer Club, Inc.

25. By early 2019, after a very intense electoral campaign in which Defendant Rivera’s brother threatened Santiago with physical violence, Defendant Rivera was elected president and the rest of the defendants were elected to the board of directors of the Federation and/or employed in director positions that respond directly to the president, Defendant Rivera.

³ PRSL introduced its Master Plan – PRSL 2.0 – for the massification of soccer; its plan for the design and construction of SafeStadium; its investors and Mayors of Municipalities that alongside PRSL were working together as public private partnerships; the owners, General Managers, coaches, trainers and members of PRSL’s Superior Level soccer clubs; PRSL sponsors; and the architects, engineers and developers of the proposed stadia. Puerto Rico’s soccer community attended, including many FPF members. The island’s sports media provided coverage.

⁴ 2017 saw Hurricane Maria crumble

26. Defendant Jose “Cukito” Martinez conspired with Defendant Rivera and John Doe 1-10, on or about July-August 2019 to sabotage PRSL’s upcoming LigaPro and its stadium building plans, after Defendant Martinez learned Plaintiffs’ PRSL and Serralta’s business plan and accompanied him to meetings with Cayey’s Mayor Rolando Ortiz Velazquez, to build a stadium in said municipality, in similar manner to what PRSL had arranged with other municipalities in Puerto Rico. The municipality would grant the land, the PRSL would build the stadium and operate it for a long term period for sports and entertainment.

27. From that moment on, the Defendants engaged in conduct designed to maintain control of the Federation and the business associated to soccer to enrich themselves at the expense of the existing leagues, employing fraud and deceit.

28. Defendants Rivera, Martinez, Mozo and Ortiz devised a scheme to create leagues that the Federation would own and operate in competition with the existing leagues. The purpose of the scheme was to eliminate the existing leagues and replace the leagues with leagues owned by the Federation and in that manner take the money that the leagues generate for the Federation to pay salaries and other benefits of monetary value to Defendants and their associates, thereby causing damages to the business of the leagues that did not belong to the Federation, such as PRSL and Liga Elite.

29. On or about September 20, 2019, FPF’s President, Ivan Rivera Gutierrez, communicated with FIFA via wire and mail, advising FIFA that a number of clubs in Puerto Rico were going to participate in a competition (the PRSL LigaPro 2019-2020 Season) not affiliated to FPF.

30. Contrarywise, PRSL was affiliated to FPF, as it had been since 2008, and two weeks away from the start of its 2019-2020 Season.

31. In addition, PRSL's legal representative, attorney Ivellisse Quiñones Ocasio, represented PRSL as its delegate before FPF, as corroborated by the attached September 20, 2019 communication.

32. Mr. Mattias Grafström, of FIFA responded to FPF on September 27, 2019, with copy to CONCACAF, informing FPF that if in fact some soccer clubs, members of the federation, had decided to participate in a tournament not authorized by the Federation, that the Federation was in a position to act in conformance with Article 14(1)(d) of the FPF Statutes to prevent it.

33. Following receipt of said letter from Defendant FIFA, Defendant Ivan Rivera-Gutierrez met, and/or had other FPF agents, meet with the clubs that were going to play in the PRSL's LigaPro and advise them that PRSL was not affiliated to the FPF, could not operate its LigaPro, and any club or player who played in its 2019-2020 season would not be considered by the Federation for awards or membership in the National Team.

34. Club managers and players contacted PRSL and advised it that they were being prevented from playing in its LigaPro.

35. PRSL's 2019-2020 season was blocked, and PRSL has not been able to obtain the Federation's affiliate status since, affecting its League, clubs, owners, investors, partners, and sponsors, interfering with PRSL's private-public arrangements, and legislative acts, for the construction of two (2) SafeStadium soccer venues that convert to shelters, in the municipalities of Dorado (agreement) and Isabela (legislative act). Towards that, PRSL, Serralta, Reyes, and other owners and investors retained architects, in Spain and the U.S., engineers in the U.S. and Puerto Rico, General Contractors in the U.S. and Puerto Rico, attorneys, accountants, lobbyists, environmental experts, land surveyors, and climate action consultants in renewables and water

capture, to the tune of millions of U.S. dollars, to no avail, since without FPF's certification, unlawfully withheld, a league and its clubs lack the ability to finance and build stadia.

36. On or about September 27, 2019, Defendant Rivera sent an email to members of the Federation falsely stating that they could not participate in the PRSL because FIFA and CONCACAF had instructed that only the Federation could operate a "Superior" league.

37. Notwithstanding, the Federation never contacted PRSL to advise it that, despite its proper affiliation with FPF, it would no longer be allowed to conduct its League. PRSL had to learn that it would not be able to conduct its 2019-2020 season tournament when clubs called to let PRSL know that they had been threatened with sanctions if they played in PRL's LigaPro.

38. This unlawful conduct caused the closure of PRSL's operations, and caused it to suffer serious economic losses that are ongoing and accruing in nature.

39. This allowed the Federation to create its own Superior league, which is called "Liga Puerto Rico" ("LPR") using, as its main operational resources, several of the players and clubs that would have participated in PRSL's league.

Defendants' violations of Federation's rules to enrich themselves

40. On May 15th, 2019, with control of the budget and disposal of funds, Defendant Rivera and his brother Erick Rivera, through the use of telecommunications, incorporated Sports and Vacation Travel Agency of Puerto Rico. Thereafter, Defendant Rivera gave written instructions, using telecommunications, to key staff to coordinate and purchase plane tickets to said entity. This action violated the Federation's statutory prohibition of conflict of interest which prohibit the conflict of interest that obviously arises between two brothers. Although a complaint was filed against Defendant Rivera before the Federation's Disciplinary and Ethics Commission regarding this violation of the Ethics Code, no action has been taken by said body.

Violation of Immigration Laws

41. Upon information and belief, Defendants Rivera, Martinez, Mozo and Ortiz, in violation of federal immigration laws, employed illegal aliens to conduct the affairs of the Federation from Puerto Rico and from outside of the United States. Some of these persons are the judges of the Disciplinary and Ethics Commission.

42. Upon information and belief, in order to sideway immigration procedures, Rivera, Martinez, Mozo and Ortiz opted to funnel all foreign nationals' contracts and payments through a foreign company property of Mozo allowing the contractors to enter US territories with tourists VISAS.

Juan M. Cornejo and the amateur leagues

43. On 2021, the Federation entered into an agreement with the existing amateur leagues, such as Liga Elite, as part of which the Federation would begin to operate its own amateur league, called "Liga Juvenil de Puerto Rico" ("LJPR") without competing, or obstructing, the operations of the existing leagues. However, as with the Superior league, the Federation did not bring in new players, nor new fields, nor new referees, because the intention of Defendants was to eliminate the existing amateur leagues and take their business. Therefore, it was a matter of time before a conflict would arise. Soon enough, among other bad faith actions, the Federation began to schedule LPR games for the same dates that Liga Elite had scheduled games and this caused logistical problems to everyone involved.

44. Plaintiff Cornejo became concerned about the operations of Liga Elite and held a meeting with the representatives of all of the clubs that participate in Liga Elite. During said meeting, Plaintiff Cornejo advocated for Liga Elite and pointed out the flaws of the Federation's league.

45. Around the same time, Plaintiff Cornejo had presented to the board of directors several complaints about the manner in which the Defendants were running the Federation, including but not limited to issues affecting the referees and the obstruction of the Federation of the Liga Elite's operations.

46. On January 13th, 2022, Defendant Ortiz notified Plaintiff Cornejo by email that an ethical complaint had been filed against him for his statements during the Liga Elite meeting. The Ethics Commission found against Plaintiff Cornejo and imposed an extraordinarily severe punishment of 2 years suspension from his position in the board of directors of the Federation and from his participation in general in the sport of soccer in Puerto Rico. This meant that Plaintiff Cornejo who is the Director of Liga Elite which operates the main amateur leagues was not available to run the leagues. This situation affected negatively the operations of Liga Elite and also affected Plaintiff Cornejo economically.

47. This eliminated the only opposition to their deceitful plans that the Defendants had in the board of directors which was Plaintiff Cornejo who had been a member of such body for eight years and had seniority over all other members and was an open critic of the conduct of the Defendants.

48. Plaintiff Cornejo was not only associated to Defendant Rivera's electoral challenger, Santiago, because his league operates in the facilities of Santiago's club, but also supported Santiago against Defendant Rivera in the elections.

49. On January 27th, 2022, Plaintiff Cornejo appealed the sanction to the Appeals Commission. The Federation's statutes provide that the Appeals Commission must resolve the appeal within 15 days of filing. Plaintiff Cornejo waited in excess of the 15 days and, on March 15th, 2022, filed an appeal to the "Tribunal de Arbitraje Deportivo del Comité Olimpico de Puerto Rico" ("TAAD").

The TAAD required the position of the Federation on the matter, but after several opportunities, the Federation failed to comply with the TAAD's request and, on June 5th, 2022, the TAAD issued a resolution ordering immediate dismissal of the sanctions and the immediate reinstalment to his positions.

50. In an act of defiance, on that same date, Defendant Ortiz notified Plaintiff Cornejo by email of a second unfounded ethical complaint and that the suspension was therefore still in effect.

51. On June 27th, 2022, Defendant Ortiz, notified the second complaint to Plaintiff Cornejo by email. It was a 2019 complaint that had been closed and was now being resuscitated.

52. On July 13th, 2022, Defendant Ortiz notified Plaintiff Cornejo by email of the complaint pending in the Ethics Commission. Cornejo answered the complaint.

53. On August 24th, 2022, Defendant Ortiz notified Cornejo by email of the Ethics Commission's resolution dismissing the charges for insufficiency of evidence.

54. The Federation and Defendant Ortiz had 10 days, or until September 3rd, 2022, to appeal the resolution but did not do it.

55. After several days had passed and the time to appeal had expired, Plaintiff Cornejo requested Defendant Ortiz to reinstate him.

56. On September 28th, 2022, Defendant Ortiz sent an email to Plaintiff Cornejo indicating that after the issuance of the resolution, the appointment of new members of the Ethics Commission was necessary and that a new Ethics Commission had to be named to consider the Federation's appeal to the dismissal, and therefore the suspension would remain in effect indefinitely until the new members of the Ethics Commission were designated. But Plaintiff Cornejo insisted that the appeal had to be done in ten days, that had already passed and that it was not to be filed with the Ethics Commission but with the Appeals Commission.

57. As Plaintiff Cornejo was not reinstated, in light of the situation, he filed a motion for contempt with the TAAD, as the Federation was not complying with the previous order of reinstalment.

58. On November 16th, 2022, with three weeks remaining of the Liga Elite tournament, RICO Defendant Ortiz under false pretenses notified Pumas de Roosevelt Futbol Club (“PRFC”) that its players were not going to be allowed to complete the tournament because of alleged failures in the affiliation process. Plaintiff Olmo who represented Plaintiff Cornejo before the Federation’s commissions and before the TAAD was the President of PRFC. After several communications by email between Defendant Ortiz and Plaintiff Olmo and massive inquiries from the players parents directly to the Federation, the players were allowed to complete the tournament. This situation affected Plaintiff Olmo in his soccer business and in his personal finances.

59. On December 20th, 2022, after realizing that the second complaint was not timely appealed, Defendant Ortiz notified, by email, a third complaint on Plaintiff Cornejo also for making use of his right to free speech to denounce the illegal conduct of Defendants. On December 29th, 2023, Defendant Ortiz notified Plaintiff Cornejo, by email, that he had been sanctioned, by a new Ethics Commission for having used his free speech to denounce the Defendants’ actions or omissions, but this time he was suspended for 4 years (double the initial sanction). To sustain such a drastic punishment, in the resolution, the Appeals Commission expressly stated that Plaintiff Cornejo had committed the same acts previously and made reference to the facts of the initial complaint brought against Plaintiff Cornejo. The previous conduct should not even be taken in consideration given that the Federation had acquiesced in the TAAD’s order dismissing the initial complaint.

60. On January 30th, 2023, Defendant Ortiz notified Plaintiff Cornejo by email of the Appeals Commission ratification of the sanction.

61. Plaintiff Cornejo filed another motion for contempt with the TAAD as this third complaint, was just as unfounded as the first complaint, and a pretext to disobey the TAAD order of reinstatement. Once again, the Federation did not comply with the TAAD and the Puerto Rico Olympic Committee began proceedings to disaffiliate.

Maria Larracuente and Bayamon - Electoral Fraud

62. On January 18th, 2023 the Federation sent an email with a memorandum – Circular No. 2023-04 - to its affiliates announcing the opening of electoral procedures and the calendar for the regional assemblies and fillings for candidacies.

63. On January 19th, 2023 the Federation sent another email with the memorandum Circular No. 2023-05 in which they change, retroactively, the qualifying requirements for filling candidacies. These changes are not in accordance to the approved statutes of November 5th, 2022.

64. Among the key new requirements is that the Federation, not the club is in charge of certifying the administrative role of a candidate by appearing in minutes and reports 5 years back and reported to the Federation.

65. Plaintiff Maria Larracuente filed her candidacy to the presidency of the Federation. Larracuente is associated with the Bayamon Soccer Club, Santiago and Plaintiff Cornejo. Under false pretenses, Defendant Ortiz informed Plaintiff Larracuente that she was not qualified even though she complied with all requirements by statute. Although Plaintiff Larracuente insisted on her qualifications, she was not allowed to participate.

66. Larracuente followed the due process of appealing her case to the Federation's electoral and appeal board, but the General Secretary, Defendant Ortiz, assumed the role of the bodies denying Larracuente of an objective and just outcome.

67. Close to the date of the upcoming elections, Defendant Ortiz notified Bayamon Soccer Club that its vote was being taken away for the elections.

José R. Olmo's legal representation

68. On February 6th, 2023, after Jose R. Torres ("Torres"), who is one of the most experienced and decorated FIFA referees in Puerto Rico, expressed to the Federation, as unofficial leader of the referees, the referees' concerns for situations that were affecting all the referees, Defendant Ortiz notified by email to Torres that there was a complaint against him that had been filed by the Director of Referees.

69. On February 16th, 2023, Plaintiff Olmo represented Torres before the Ethics commission.

70. On February 24th, 2023, PRFC was notified by Defendant Ortiz that although plaintiff Olmo, as club president, had submitted the club's documentation for affiliation to the Federation, since Plaintiff Olmo was representing Plaintiff Cornejo and Torres, Plaintiff Olmo had a conflict of interest and also Plaintiff Olmo was requesting the intervention of a third party, the TAAD, and therefore a resolution was issued by the Board of Directors, or "Consejo", concluding that Plaintiff Olmo violated the statutes and Ethics Code and therefore the affiliation process could not continue until another club officer was named to represent the club in the process. This caused Plaintiff Olmo to resign as PRFC president to avoid further damage to the children that play in his club and as a result, the clubs operational plans were paused to the economic detriment of the club and Plaintiff Olmo. As a result, Plaintiff Olmo's soccer business and personal finances have been negatively affected.

71. On March 12th, 2023, the Defendants won the elections and kept control of the Federation.

72. On March 27th, 2023, the Federation was disaffiliated by the Puerto Rico Olympic Committee – COPUR-.

73. The suspension of Plaintiff Cornejo from the board of directors and from the Liga Elite for over a year, the taking of Bayamon's vote, the denial of Larracuenta's candidacy and the suspension of Plaintiff Olmo, illegally benefitted the Defendants to win the elections and/or to maintain control of the Federation.

74. The Defendants have abused the Federation processes by filing fraudulent complaints before the Disciplinary and Ethics Commission and Appellate Commission to exclude Plaintiff Cornejo from the board of directors to maintain control of the enterprise.

Futbol Boricua (FBNET), Inc.

75. Edwin Jusino, as president of Futbol Boricua (FBNET), Inc., entered into an agreement with PRSL to transmit live its weekly games, starting October 2019. Futbol Boricua invested in coordinating logistics, purchased audiovisual equipment and retained personnel to be able to cover these games, between 2 and 4 games every weekend.

76. Defendants learned of the plan, and copied it, retaining a competitor close to Defendant Rivera to cover the Federations Liga PR games, while leaving Futbol Boricua (FBNET), Inc. without a League to cover.

77. Plaintiffs sue to recover their out-of-pocket losses, compensatory damages, punitive damages, and attorneys' fees and expenses under the Racketeer Influenced Corrupt Organization Act ("RICO").

FIRST CLAIM FOR RELIEF:

**Violations of Federal Civil RICO—Conduct of a RICO Enterprise, 18 U.S.C. § 1962(c)
(RICO Defendants)**

78. The plaintiffs incorporate, herein, each of the aforementioned paragraphs.

79. At all relevant times, Defendants are each "person[s]" within the meaning of 18 U.S.C. §§ 1961(3) and 1962(c).

80. Defendants each violated 18 U.S.C. § 1962(c) by the acts described in the paragraphs above and below.

Enterprise

81. At all relevant times, the Federation constitutes an “Enterprise” within the meaning of 18 U.S.C. §§ 1961(4) and 1962(c). At all relevant times, the Federation was engaged in, and/or its activities affected, interstate commerce and/or foreign commerce within the meaning of 18 U.S.C. § 1962(c). At all relevant times, Defendants held a position in the Federation, as well as participated in the operation, management, and directed the affairs of the Federation. The Federation, as alleged herein, was not limited to Defendants’ predicate acts and has activities extending beyond Defendants’ racketeering activity. The Federation exists separate and apart from the pattern of racketeering activity. Defendants have had and do have legitimate business plans outside the pattern of racketeering activity related to the Federation.

Use of the Mails and Wires to Defraud, in violation of 18 U.S.C. §§ 1341 and 1343.

82. Defendants devised or intended to devise a scheme to defraud Plaintiffs of money, property, and other benefits of monetary value by depriving Plaintiffs of their rights and Federation membership by means of false or fraudulent pretenses and representations.

83. For the purposes of executing their scheme, Defendants delivered or caused delivery of various documents and things by the U.S. mails or by private or commercial interstate carriers, or received such therefrom. For the purposes of executing their scheme, Defendants transmitted or caused to be transmitted by means of wire communications in interstate or foreign commerce various writings, signs, and signals.

84. In furtherance of their scheme, Defendants used the wires and/or U.S. mails or private or commercial carriers to deliver documents and things to Plaintiffs, or the Enterprise, for the purposes of defrauding Plaintiffs, including, but not limited to the following:

- a. Emails and website postings incorporating false, fraudulent and misleading statements regarding: the authority of the Federation, FIFA and CONCACAF; the purported exclusion of Plaintiffs from the affairs of the Federation;
- b. Wirings and/or mailings between and among Defendants concerning: the scheme to defraud Plaintiffs of money and property as well as other benefits.
- c. Funds transferred between Defendants with the intent that those funds be used to promote the carrying on of Defendants' scheme to defraud Plaintiffs of money and property as well as other benefits;

85. The Defendants used wire and mail communications in furtherance of their scheme to defraud Plaintiffs, in violation of 18 U.S.C. §§ 1341 and 1343, including but not limited to, the following instances:

- a. Defendant Rivera published in the website of the Federation information that discredited the PRSL;
- b. Defendant Rivera emails to PRSL and to Federation members prohibiting participation in PRSL's league and discrediting PRSL;
- c. Defendant Ortiz emails to Plaintiff Cornejo excluding him from the Federation's affairs and from impairing his employment;
- d. Defendant Ortiz emails to Bayamon and Plaintiff Larracuente excluding their voting and candidacy;

- e. Defendant Ortiz emails to PRFC and Plaintiff Olmo excluding Plaintiff Olmo from the Federation for acting as lawyer for Cornejo and Torres and hindering his work at PRFC.

- 86. Defendants used the wires and mails in interstate commerce with intent to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on, of an unlawful activity.
- 87. Defendants racketeering activities were multiple, continuous, and ongoing from about 2019, and remain ongoing.
- 88. Defendants participated in the scheme or artifice knowingly, willfully, and with the specific intent to advance their scheme to deceive or defraud Plaintiffs. Defendants knowingly and intentionally prepared documents, including but not limited to, resolutions, letters, notices, and other documents, and then knowingly and with the intent to deceive Plaintiffs, caused those documents to be sent to Plaintiffs or entities that would further Defendants' scheme to defraud.
- 89. Defendants have, on multiple occasions, knowing that the property involved in a financial transaction represents the proceeds of some form of unlawful activity, conducted or attempt to conduct a financial transaction which in fact involves the proceeds of specified unlawful activity with the intent to promote the carrying on of specified unlawful activity, including, but not limited to, violations of 18 U.S.C. §§ 1341 and 1343. RICO Defendants have, therefore, violated 18 U.S.C § 1956(a)(1)(A)(i).
- 90. Each Defendant has engaged in multiple predicate acts, as described in paragraphs 23-80, *supra*. The conduct of each Defendant described in paragraphs 19-77, *supra*, constitutes a pattern of racketeering activity within the meaning of 18 U.S.C. § 1961(5).

91. Defendants' violations of federal law as set forth herein, each of which directly and proximately injured Plaintiffs, constitutes a continuous course of conduct, which was intended to defraud Plaintiffs of money and property through false representations, fraud, deceit, and other improper and unlawful means. Therefore, said violations were a part of racketeering activity as defined by 18 U.S.C. §§ 1961(1) and (5).

92. Plaintiffs were injured in their money and property by reason of Defendants' violation of 18 U.S.C. § 1962(c).

93. Defendants' injuries to Plaintiffs were a direct, proximate, and reasonably foreseeable result of their violation of 18 U.S.C. § 1962. Plaintiffs are the ultimate victims of defendants' unlawful enterprises. Plaintiffs have been and will continue to be injured in their money and property in an amount to be determined at trial.

94. Pursuant to 18 U.S.C. § 1962(c), Plaintiffs are entitled to recover treble damages plus costs and attorneys' fees from Defendants as well as any other relief authorized by statute.

SECOND CLAIM FOR RELIEF:

Violations of Federal Civil RICO—Taking Control of an Enterprise, 18 U.S.C. § 1962(b)

(RICO Defendants)

95. Plaintiffs incorporate by reference all the preceding paragraphs of this Complaint as if fully set forth herein.

96. At all relevant times, Defendants each were "person[s]" pursuant to 18 U.S.C. §§ 1961(3) and 1962(d). At all relevant times, the Federation constitutes an "Enterprise" within the meaning of 18 U.S.C. §§ 1961(4) and 1962(c). At all relevant times, the Federation was engaged in, and/or its activities affected, interstate commerce and/or foreign commerce within the meaning of 18 U.S.C. § 1962(c). At all times relevant hereto, RICO Defendants each held a

position in or were otherwise affiliated with the Federation as well as participated in the operation, management, and directed the affairs of the Federation. The Federation, as alleged herein, was not limited to Defendants' predicate acts and has activities extending beyond Defendants' racketeering activity. The Federation exists separate and apart from the pattern of racketeering activity. Defendants have had and do have legitimate governmental business plans outside the pattern of racketeering activity related to the Federation.

97. Through a pattern of racketeering activity alleged herein, including without limitation the Defendants' violations of 18 U.S.C. §§ 1341 and 1343, Defendants took control of the Federation during the March 2023 elections. Therefore, the elections must be vacated and a new election must be held to reorganize the Federation.

98. By controlling the Federation, Defendants were able to cause this Enterprise to take actions to defraud Plaintiffs of money, property, and benefits of monetary value.

99. As a direct and proximate result of Defendants' taking control of the Federation, in violation of 18 U.S.C. § 1962, Plaintiffs were injured in their monies, property, and benefits of monetary value.

100. Pursuant to 18 U.S.C. § 1962(c), Plaintiffs are entitled to recover treble damages plus costs and attorneys' fees from Defendants as well as any other relief authorized by statute.

THIRD CLAIM FOR RELIEF:

Violations of Federal Civil RICO— 18 U.S.C. § 1962(a) (RICO Defendants)

101. Plaintiffs incorporate by reference all the preceding paragraphs of this Complaint as if fully set forth herein.

102. Defendants invested the income derived from a pattern of racketeering activity in the Federation to continue their illegal conduct.

FOURTH CLAIM FOR RELIEF:

Violations of Civil RICO—Conspiracy to Violate § 1962(a), (b) and (c) of RICO, 18 U.S.C.

§ 1962(d) (RICO Defendants)

103. Plaintiffs incorporate by reference all the preceding paragraphs of this Complaint as if fully set forth herein.

104. At all relevant times, Defendants each were “person[s]” pursuant to 18 U.S.C. §§ 1961(3) and 1962(d).

105. At all relevant times, the Federation constitutes an “Enterprise” within the meaning of 18 U.S.C. §§ 1961(4) and 1962(a), (b) and (c). At all relevant times, the Federation was engaged in, and/or its activities affected, interstate commerce and/or foreign commerce within the meaning of 18 U.S.C. § 1962(a), (b) and (c). At all times relevant hereto, Defendants each held a position in or were otherwise affiliated with the Federation as well as participated in the operation, management, and directed the affairs of the Federation. The Federation, as alleged herein, was not limited to Defendants’ predicate acts and has activities extending beyond Defendants’ racketeering activity. The Federation exists separate and apart from the pattern of racketeering activity. Defendants have had and do have legitimate governmental business plans outside the pattern of racketeering activity related to the Federation.

106. Defendants have unlawfully, knowingly and willfully combined, conspired, confederated and agreed together and with others to violate 18 U.S.C. § 1962(c) as described above, in violation of 18 U.S.C. § 1962(d).

107. The conspiracy commenced at least as early as 2019, and remains ongoing.

108. The conspiracy’s purpose was to defraud Plaintiffs of money, property, and benefits of monetary value by fraudulently depriving Plaintiffs of their membership in the Federation.

109. Each Defendant committed at least one overt act in furtherance of such conspiracy.

110. These acts in furtherance of the conspiracy include, but are not limited to, the acts set forth in paragraphs 19-77, *supra*.

111. Defendants knew that they were engaged in a conspiracy to commit the predicate acts, and they knew that the predicate acts were part of such racketeering activity, and the participation and agreement of each of Defendants was necessary to allow the commission of this pattern of racketeering activity. Defendants' conduct constitutes a conspiracy to violate 18 U.S.C. § 1962(c), in violation of 18 U.S.C. § 1962(d).

112. Each Defendant knew about and agreed to facilitate the scheme to defraud Plaintiffs of their money, property, and other tribal, state and federal benefits of monetary value by fraudulently depriving them of their rights and/or Federation membership. It was part of the conspiracy that Defendants would commit a pattern of racketeering activity in the conduct of the affairs of the Federation, including the acts of racketeering set forth in paragraphs 23-80, *supra*.

113. As a direct and proximate result of Defendants' conspiracy, the acts of racketeering activity of the Enterprise, the overt acts taken in furtherance of that conspiracy, and violations of 18 U.S.C. § 1962(d), Plaintiffs have been injured in their money and property, in an amount to be determined at trial.

114. Pursuant to 18 U.S.C. § 1964(c), Plaintiffs are entitled to recover treble damages plus costs and attorneys' fees from Defendants as well as any other relief authorized by statute.

State Law Torts Claim. Supplemental Jurisdiction.

115. The plaintiffs incorporate herein each of the preceding paragraphs.

116. The facts stated above give rise to a state tort action. The defendants are, therefore, also liable to the plaintiffs under Article 1536 the Civil Code of Puerto Rico (“CCPR”), for all damages that their negligent actions have caused and continue to cause upon the plaintiffs, as aforementioned.

117. CCPR’s article 18 prohibits the abuse of process that the RICO Defendants have engaged by illegally closing PRSL’s business and by filing unfounded complaints against Plaintiffs. Therefore, pursuant to Article 1536, Defendants are liable to Plaintiffs for their damages.

118. As a direct and proximate result of the negligent actions of the codefendants, as above described, the plaintiffs have suffered damages. Therefore, the defendants are jointly liable to the plaintiffs for the payment of **compensatory damages** consequent to their actions. Judgment is sought for compensatory damages in the amount of \$100,000 for Plaintiff Cornejo, \$500,000 for Plaintiff Larracuenta and \$250,000 for Plaintiff Olmo, plus costs of this action, attorney’s fees and such other relief as the Court deems fair and appropriate under the circumstances.

119. PRSL’s compensatory damages are ongoing and accruing in nature, calculated at U.S. \$25 million today. Serralta’s compensatory damages are ongoing and accruing in nature, calculated at U.S. \$1.5 million today.

120. Plaintiffs also demand nominal damages, and all other damages allowed, including but not limited to treble damages, punitive damages, sanctions, attorney’s fees and costs, prejudgment and post judgment interest.

121. All codefendants are jointly liable for Plaintiffs’ damages.

PRAYER FOR RELIEF

122. Wherefore, Plaintiffs, respectfully, request that the Court:

- a. award Plaintiffs such equitable injunctive and ancillary relief as may be necessary to avert the likelihood of Plaintiffs' irreparable injury or prohibit the illicit conduct described herein during the pendency of this action and to preserve the possibility of effective final relief, including but not limited to, a temporary restraining order and preliminary injunctions;
- b. order the reorganization of the Federation through a new election;
- c. Award Plaintiffs a declaratory judgment;
- d. Order Defendants to cease and desist from violating 18 U.S.C. § 1964;
- e. Enter judgment against Defendants in an amount equal to three times the amount of damages sustained because of Defendants' actions, plus a civil penalty for each violation of 18 U.S.C. § 1964;
- f. Restitution to Plaintiffs of all money, property, and benefits Plaintiffs were unlawfully defrauded and deprived of by Defendants;
- g. Award attorneys' fees and costs to Plaintiffs;
- h. award damages to Plaintiffs in an amount to be determined at trial; and,
- i. Grant to Plaintiffs whatever other relief the Court may deem just and proper, including treble damages.

DEMAND FOR JURY TRIAL

Plaintiffs hereby demand a trial by jury.

DATED this 26th day of April, 2023.

Respectfully submitted,

S/José R. Olmo-Rodríguez
José R. Olmo-Rodríguez
USDC PR 213405

261 Ave. Domenench, SJ PR 00918
787.758.3570/jrolmo1@gmail.com

By: /s/Ibrahim Reyes, Esq.
Ibrahim Reyes
Florida Bar No. 581798
REYES LAWYERS, P.A.
236 Valencia Avenue
Coral Gables, FL 33134
Tel. 305-445-0011
Fax. 305-445-1181
Email: ireyes@reyeslawyers.com
(Pro hac vice admission pending)

Counsel for the Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 26th day of April, 2023, I electronically filed the foregoing Complaint with demand for jury trial, with the Clerk of Court using PACER, which will send a notice of such filing to all attorneys of record in this case.

/s/ Jose R. Olmo-Rodríguez
José R. Olmo-Rodríguez,
Esquire

/s/ Ibrahim Reyes
Ibrahim Reyes, Esquire

JS 44 (Rev. 09/19)

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 NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS Puerto Rico Soccer League, Inc.	DEFENDANTS Federación Puertorriqueña de Fútbol
(b) County of Residence of First Listed Plaintiff <u>Puerto Rico</u> <i>(EXCEPT IN U.S. PLAINTIFF CASES)</i>	County of Residence of First Listed Defendant <u>Puerto Rico</u> <i>(IN U.S. PLAINTIFF CASES ONLY)</i>
(c) Attorneys <i>(Firm Name, Address, and Telephone Number)</i> Jose R. Olmo Rodriguez, 261 Ave. Domenech, SJ PR 00918	NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED. Attorneys <i>(If Known)</i>

II. BASIS OF JURISDICTION <i>(Place an “X” in One Box Only)</i>	III. CITIZENSHIP OF PRINCIPAL PARTIES <i>(Place an “X” in One Box for Plaintiff and One Box for Defendant)</i>
☐ 1 U.S. Government Plaintiff	PTF DEF ☒ 1 ☐ 1 Citizen of This State
☒ 3 Federal Question <i>(U.S. Government Not a Party)</i>	☐ 1 ☐ 1 Incorporated <i>or</i> Principal Place of Business In This State
☐ 2 U.S. Government Defendant	☐ 2 ☐ 2 Citizen of Another State
☐ 4 Diversity <i>(Indicate Citizenship of Parties in Item III)</i>	☐ 2 ☐ 2 Incorporated <i>and</i> Principal Place of Business In Another State
	☐ 3 ☐ 3 Citizen or Subject of a Foreign Country
	☐ 3 ☐ 3 Foreign Nation

IV. NATURE OF SUIT <i>(Place an “X” in One Box Only)</i>					Click here for: Nature of Suit Code Descriptions.				
CONTRACT	TORTS		FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES				
☐ 110 Insurance	PERSONAL INJURY	PERSONAL INJURY	☐ 625 Drug Related Seizure of Property 21 USC 881	☐ 422 Appeal 28 USC 158	☐ 375 False Claims Act				
☐ 120 Marine	☐ 310 Airplane	☐ 365 Personal Injury - Product Liability	☐ 423 Withdrawal 28 USC 157	☐ 423 Withdrawal 28 USC 157	☐ 376 Qui Tam (31 USC 3729(a))				
☐ 130 Miller Act	☐ 315 Airplane Product Liability	☐ 367 Health Care/ Pharmaceutical Personal Injury Product Liability	☐ 690 Other	PROPERTY RIGHTS	☐ 400 State Reapportionment				
☐ 140 Negotiable Instrument	☐ 320 Assault, Libel & Slander	☐ 368 Asbestos Personal Injury Product Liability		☐ 820 Copyrights	☐ 410 Antitrust				
☐ 150 Recovery of Overpayment & Enforcement of Judgment	☐ 330 Federal Employers’ Liability			☐ 830 Patent	☐ 430 Banks and Banking				
☐ 151 Medicare Act	☐ 340 Marine	PERSONAL PROPERTY		☐ 835 Patent - Abbreviated New Drug Application	☐ 450 Commerce				
☐ 152 Recovery of Defaulted Student Loans (Excludes Veterans)	☐ 345 Marine Product Liability	☐ 370 Other Fraud		☐ 840 Trademark	☐ 460 Deportation				
☐ 153 Recovery of Overpayment of Veteran’s Benefits	☐ 350 Motor Vehicle	☐ 371 Truth in Lending	LABOR	SOCIAL SECURITY	☒ 470 Racketeer Influenced and Corrupt Organizations				
☐ 160 Stockholders’ Suits	☐ 355 Motor Vehicle Product Liability	☐ 380 Other Personal Property Damage	☐ 710 Fair Labor Standards Act	☐ 861 HIA (1395ff)	☐ 480 Consumer Credit (15 USC 1681 or 1692)				
☐ 190 Other Contract	☐ 360 Other Personal Injury	☐ 385 Property Damage Product Liability	☐ 720 Labor/Management Relations	☐ 862 Black Lung (923)	☐ 485 Telephone Consumer Protection Act				
☐ 195 Contract Product Liability	☐ 362 Personal Injury - Medical Malpractice		☐ 740 Railway Labor Act	☐ 863 DIWC/DIWW (405(g))	☐ 490 Cable/Sat TV				
☐ 196 Franchise			☐ 751 Family and Medical Leave Act	☐ 864 SSID Title XVI	☐ 850 Securities/Commodities/ Exchange				
			☐ 790 Other Labor Litigation	FEDERAL TAX SUITS	☐ 890 Other Statutory Actions				
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS	☐ 791 Employee Retirement Income Security Act	☐ 870 Taxes (U.S. Plaintiff or Defendant)	☐ 891 Agricultural Acts				
☐ 210 Land Condemnation	☐ 440 Other Civil Rights	Habeas Corpus:		☐ 871 IRS—Third Party 26 USC 7609	☐ 893 Environmental Matters				
☐ 220 Foreclosure	☐ 441 Voting	☐ 463 Alien Detainee			☐ 895 Freedom of Information Act				
☐ 230 Rent Lease & Ejectment	☐ 442 Employment	☐ 510 Motions to Vacate Sentence			☐ 896 Arbitration				
☐ 240 Torts to Land	☐ 443 Housing/ Accommodations	☐ 530 General	IMMIGRATION		☐ 899 Administrative Procedure Act/Review or Appeal of Agency Decision				
☐ 245 Tort Product Liability	☐ 445 Amer. w/Disabilities - Employment	Other:	☐ 462 Naturalization Application		☐ 950 Constitutionality of State Statutes				
☐ 290 All Other Real Property	☐ 446 Amer. w/Disabilities - Other	☐ 540 Mandamus & Other	☐ 465 Other Immigration Actions						
	☐ 448 Education	☐ 550 Civil Rights							
		☐ 555 Prison Condition							
		☐ 560 Civil Detainee - Conditions of Confinement							

V. ORIGIN <i>(Place an “X” in One Box Only)</i>							
☒ 1 Original Proceeding	☐ 2 Removed from State Court	☐ 3 Remanded from Appellate Court	☐ 4 Reinstated or Reopened	☐ 5 Transferred from Another District <i>(specify)</i>	☐ 6 Multidistrict Litigation - Transfer	☐ 8 Multidistrict Litigation - Direct File	

VI. CAUSE OF ACTION	Cite the U.S. Civil Statute under which you are filing <i>(Do not cite jurisdictional statutes unless diversity):</i> 18 U.S.C. § 1964 “RICO”
	Brief description of cause: racketeering to maintain control of enterprise, etc....

VII. REQUESTED IN COMPLAINT:	☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.	DEMAND \$ 28,250,000.00	CHECK YES only if demanded in complaint: JURY DEMAND: ☒ Yes ☐ No
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VIII. RELATED CASE(S) IF ANY	<i>(See instructions):</i>
JUDGE	DOCKET NUMBER

DATE	SIGNATURE OF ATTORNEY OF RECORD
------	---------------------------------

FOR OFFICE USE ONLY				
RECEIPT #	AMOUNT	APPLYING IFP	JUDGE	MAG. JUDGE

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading 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. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) **Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) **County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) **Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. **Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. **Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. **Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. **Origin.** Place an "X" in one of the seven boxes.
Original Proceedings. (1) Cases which originate in the United States district courts.
Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.
Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. **Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service
- VII. **Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. **Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.
- Date and Attorney Signature.** Date and sign the civil cover sheet.

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

CATEGORY SHEET

You must accompany your complaint with this Category Sheet, and the Civil Cover Sheet (JS-44).

Attorney Name (Last, First, MI):

Olmo-Rodriguez, Jose R.

USDC-PR Bar Number:

213405

Email Address:

jrolmo1@gmail.com

1.

Title (caption) of the Case (provide only the names of the first party on each side):

Plaintiff:

Puerto Rico Soccer League

Defendant:

Federacion Puertorriquena de Futbol

2.

Indicate the category to which this case belongs:

☒ Ordinary Civil Case

☐ Social Security

☐ Banking

☐ Injunction

3.

Indicate the title and number of related cases (if any).

4.

Has a prior action between the same parties and based on the same claim ever been filed before this Court?

☐ Yes

☒ No

5.

Is this case required to be heard and determined by a district court of three judges pursuant to 28 U.S.C. § 2284?

☐ Yes

☒ No

6.

Does this case question the constitutionality of a state statute? (See, Fed.R.Civ. P. 24)

☐ Yes

☒ No
- Date Submitted:

April 26th, 2023
- rev. Dec. 2009
- Print Form

Reset Form