

Rule 83.8. RICO CASES

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- (b) This Statement must include the facts that the Plaintiff is relying upon to initiate this RICO complaint as a result of the “reasonable inquiry” required by FED. R. CIV. P. 11. This Statement must be in a form which uses both the numbers and letters as set forth below and must, in detail and with specificity:

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- (5) Describe in detail the pattern of racketeering activity or collection of unlawful debts alleged for each RICO claim. A description of the pattern of racketeering must include the following information:

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- (C) If the RICO claim is based on the predicate offenses of wire fraud, mail fraud, or fraud in the sale of securities, the “circumstances constituting fraud or mistake ~~shall~~ must be stated with particularity.” FED. R. CIV. P. 9(b). Identify the time, place, and contents of the alleged misrepresentations, and the identity of persons to whom and by whom the alleged misrepresentations were made;