

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS

FILED

MAR 20 1986

JESSE E. CLARK, CLERK
BY DEPUTY: *J. Baze*

THE REPUBLIC OF THE PHILIPPINES,
PLAINTIFF,

v.

FERDINAND E. MARCOS; IMELDA
ROMUALDEZ MARCOS; RICHARD A.
GRAY, JR.; JAMES S. HUDSON,
SR.; JOSE Y. CAMPOS; BETTY D.
CAMPOS; SIMEON DEE; MARINO K.
TAN (a/k/a MARIANO K. TAN);
JEFFREY CAMPOS; WILLIAM J.
WRIGHT; POINT GREY INVESTMENT
CORPORATION, N.V.; PEMBERTON
INVESTMENT CORPORATION, N.V.;
CHILLIWACK INVESTMENT
CORPORATION, N.V.; ELLESMERE
INVESTMENT CORPORATION, N.V.;
BRETON PROPERTY CORPORATION,
N.V.; PENDER INVESTMENT
CORPORATION, N.V.; LANGLEY
INVESTMENT CORPORATION, N.V.;
REVELSTOKE INVESTMENT
CORPORATION, N.V.; TRANSCONTI
INVESTMENT CORPORATION, N.V.;
UNAM INVESTMENT CORPORATION,
N.V.; VERNON INVESTMENT
CORPORATION, N.V.; CORDILLERA
INVESTMENT CORPORATION, N.V.;
KELOWNA INVESTMENT CORPORATION,
N.V.; PENTICTON INVESTMENT
CORPORATION, N.V.; HANEY
INVESTMENT CORPORATION, N.V.;
HANEY INVESTMENT CORPORATION,
N.V., d/b/a TEXAS HANEY
INVESTMENT CORPORATION, N.V.;
BOWEN INVESTMENT CORPORATION,
N.V.; KAMLOOPS INVESTMENT
CORPORATION, N.V.; MELVILLE
INVESTMENT CORPORATION, N.V.;
ABBOTSFORD INVESTMENT
CORPORATION, N.V.; KERRISDALE
INVESTMENT CORPORATION, N.V.;

DEFENDANTS.

C.A. No. H-86-1184

COMPLAINT (JURY DEMANDED): RACKETEERING; CONVERSION;
FRAUD; CIVIL CONSPIRACY; UNJUST ENRICHMENT;
CONSTRUCTIVE TRUST; ACCOUNTING; FOR MONEY DAMAGES,
AND OTHER LEGAL AND EQUITABLE RELIEF

Plaintiff alleges:

Jurisdiction

1. This Court has jurisdiction under 28 U.S.C. § 1331, as this is a civil action under 18 U.S.C. § 1964. This court has jurisdiction of all nonfederal claims under the pendent jurisdiction doctrine.

Nature of the Action

2. This is a civil action brought by the Republic of the Philippines to recover for wrongs committed by Ferdinand E. Marcos, his wife Imelda Romualdez Marcos and others acting as conspirators and aiders and abettors with them. During his twenty years as President of the Philippines, Marcos systematically skimmed and converted to his own use and to the use of others money, funds, property and other things of value beneficially owned by the Republic of the Philippines. Much of the property thus fraudulently obtained originated in the United States, and was directly or indirectly the product of various United States-funded or

supported programs of investment and assistance to the Republic of the Philippines. Mr. Marcos and his accomplices and co-conspirators have sought to use property holdings in the United States, and specifically in the State of Texas, to conceal and facilitate their frauds, swindles and thefts. The allegations in this complaint are made on information and belief, except where otherwise indicated.

Venue

3. Venue is proper as the causes of action arose within this judicial district within the meaning of 28 U.S.C. § 1391(b). Venue is also proper in this district under 18 U.S.C. § 1965 because the defendants transacted their affairs in this district. Moreover, to the extent that criminal offenses committed as part of a pattern of racketeering are alleged herein, these were continuing offenses committed in part in this judicial district and elsewhere in Texas within the meaning of 18 U.S.C. § 3237.

Parties

4. The Republic of the Philippines is a sovereign state, and a person within the meaning of 18 U.S.C. § 1961(3)...

5. Ferdinand E. Marcos was for twenty years President of the Philippines. He possesses no immunity from service

or suit. Despite the fact that his annual salary as President was only \$5,600 per year, he accumulated a substantial fortune through unlawful activities including the unlawful activities alleged in this complaint.

6. Service of process may be had on Ferdinand E. Marcos at Hickam Air Force Base, Honolulu, Hawaii 96853.

7. Imelda Romualdez Marcos is the wife of Ferdinand E. Marcos, and participated with him in a culpable manner in the unlawful activities alleged in this complaint. Service of process may be had on Imelda Romualdez Marcos at Hickam Air Force Base, Honolulu, Hawaii 96853.

8. Richard A. Gray, Jr. and James S. Hudson, Sr., are Texas business advisors, investors and real estate brokers associated in fact with Ferdinand E. Marcos, Imelda Romualdez Marcos, and the other defendants in the unlawful activities alleged herein. They were among the principal architects of the transactions alleged in this complaint. They are citizens and residents of Texas. At all times material to this complaint, they acted with knowledge that they were engaged in unlawful activity and with the intent to further such unlawful activity and to profit from it.

9. Service of process may be had on Richard A. Gray, Jr. at the offices of Wiggins & Gray, 3811 Turtle Creek Blvd., Suite 1100, Dallas, Texas 75219.

10. Service of process may be had on James S. Hudson, Sr. at 4224 Beverly, Dallas, Texas 75205.

11. Jose Y. Campos, Betty D. Campos, Simeon Dee, Marino K. Tan (also known as Mariano K. Tan), Jeffrey Campos and William J. Wright are associates of one another and of Ferdinand and Imelda Marcos. Individually and through the Netherlands Antilles entities named as defendants and other Texas and Netherlands Antilles entities, they created and participated in the creation of an elaborate network of secret corporations and other secret entities to facilitate and to mask the commission of the frauds and swindles alleged in this complaint. They have substantial contacts with Texas.

12. Service of process may be had on Jose Y. Campos at 5675 Northwest Marine Drive, Vancouver, British Columbia V7W2R7.

13. Service of process may be had on Betty D. Campos at 5675 Northwest Marine Drive, Vancouver, British Columbia V7W2R7.

14. Service of process may be had on Simeon Dee at 4725 West Sixth, Vancouver, British Columbia V6T1C4.

15. Service of process may be had on Marino K. Tan at Chiu Lung Building, Chiu Lung Street, Central Hong Kong, Hong Kong.

16. Service of process may be had on Jeffrey Campos at 5675 Northwest Marine Drive, Vancouver, British Columbia V7W2R7.

17. Service of process may be had on William J. Wright at 1392 West 46th Street, Vancouver, British Columbia V6Z2K5.

18. Point Grey Investment Corporation, N.V., Pemberton Investment Corporation, N.V., Chilliwack Investment Corporation, N.V., Ellesmere Investment Corporation, N.V., Breton Property Corporation, N.V., Pender Investment Corporation, N.V., Langley Investment Corporation, N.V., Revelstoke Investment Corporation, N.V., Transconti Investment Corporation, N.V., UNAM Investment Corporation, N.V., Vernon Investment Corporation, N.V., Cordillera Investment Corporation, N.V., Kelowna Investment Corporation, N.V., Penticton Investment Corporation, N.V., Haney Investment Corporation, N.V., Haney Investment Corporation d/b/a/ Texas Haney Investment, N.V., Abbotsford Investment Corporation, N.V., Melville Investment Corporation, N.V., Kamloops Investment Corporation, N.V., and Bowen Investment Corporation, N.V., Kerrisdale Investment Corporation, N.V., ("the Netherlands Antilles corporate defendants"), are Netherlands Antilles corporations registered with the Texas Secretary of State. They are part of the network of

financial entities used to perpetuate the fraud. They are owned and controlled by the individual defendants.

19. Service of process may be had on Point Grey Investment Corporation, N.V. through its registered agent, George Lee, at 4100 First City Centre, 1700 Pacific Avenue, Dallas, Texas 75201-4618.

20. Service of process may be had on Pemberton Investment Corporation, N.V. through its registered agent, Addison G. Wilson III, at 3811 Turtle Creek Blvd., Suite 1910, Dallas, Texas 75219.

21. Service of process may be had on Chilliwack Investment Corporation, N.V. through its registered agent, George T. Lee, Jr., at 4100 First City Centre, 1700 Pacific Avenue, Dallas, Texas 75201-4618.

22. Service of process may be had on Ellesmere Investment Corporation, N.V. through its registered agent, George T. Lee, Jr., at 4100 First City Centre, 1700 Pacific Avenue, Dallas, Texas 75201-4618.

23. Service of process may be had on Breton Property Corporation, N.V. through its registered agent, George Lee, at 4100 First City Centre, 1700 Pacific Avenue, Dallas, Texas 75201-4618.

24. Service of process may be had on Pender Investment Corporation, N.V. through its registered agent, George T.

Lee, Jr., at 4100 First City Centre, 1700 Pacific Avenue, Dallas, Texas 75201-4618.

25. Service of process may be had on Langley Investment Corporation, N.V. through its registered agent, George T. Lee, Jr., at 4100 First City Centre, 1700 Pacific Avenue, Dallas, Texas 75201-4618.

26. Service of process may be had on Revelstoke Investment Corporation, N.V. through its registered agent, George T. Lee, Jr., at 4100 First City Centre, 1700 Pacific Avenue, Dallas, Texas 75201-4618.

27. Service of process may be had on Transconti Investment Corporation, N.V. through its registered agent, George T. Lee, Jr., at 4100 First City Centre, 1700 Pacific Avenue, Dallas, Texas 75201-4618.

28. Service of process may be had on UNAM Investment Corporation, N.V. through its registered agent, George T. Lee, Jr., at 4100 First City Centre, 1700 Pacific Avenue, Dallas, Texas 75201-4618.

29. Service of process may be had on Vernon Investment Corporation, N.V. through its registered agent, Addison G. Wilson III, at 3811 Turtle Creek Blvd., Suite 1910, Dallas, Texas 75219.

30. Service of process may be had on Cordillera Investment Corporation, N.V. through its registered agent,

George T. Lee, Jr., at 4100 First City Centre, 1700 Pacific Avenue, Dallas, Texas 75201-4618.

31. Service of process may be had on Kelowna Investment Corporation, N.V. through its registered agent, George T. Lee, Jr., at 4100 First City Centre, 1700 Pacific Avenue, Dallas, Texas 75201-4618.

32. Service of process may be had on Penticton Investment Corporation, N.V. through its registered agent, George T. Lee, Jr., at 4100 First City Centre, 1700 Pacific Avenue, Dallas, Texas 75201-4618.

33. Service of process may be had on Haney Investment Corporation, N.V. and on Haney Investment Corporation, N.V. d/b/a Texas Haney Investment Corporation, N.V. through the registered agent, Michael J. Kaine, at 304 Milam Building, San Antonio, Texas 78205.

34. Service of process may be had on Abbotsford Investment Corporation, N.V. through its registered agent, Michael J. Kaine, at 304 Milam Building, San Antonio, Texas 78205.

35. Service of process may be had on Melville Investment Corporation, N.V. through its registered agent, Michael J. Kaine, at 304 Milam Building, San Antonio, Texas 78205.

36. Service of process may be had on Kamloops Investment Corporation, N.V. through its registered agent, George

T. Lee, Jr., at 4100 First City Centre, 1700 Pacific Avenue, 75201-4618.

37. Service of process may be had on Bowen Investment Corporation, N.V. and Kerrisdale Investment Corporation, N.V. through its registered agent, George T. Lee, Jr., at 4100 First City Centre, 1700 Pacific Avenue, 75201-4618.

First Claim: Racketeering

38. Plaintiff realleges and incorporates paragraphs 1 through 37 above.

39. From in or about 1971, to and including the present day, all the defendants knowingly and willfully formed and participated in the formation and operation of an enterprise consisting of a group of individuals and entities associated in fact for the purposes of committing and carrying out the activities alleged in this complaint. This enterprise had a definable structure, a continuous existence, and mechanisms for controlling its operations. The enterprise engaged in and affected interstate and foreign commerce. Defendants Ferdinand and Imelda Marcos were the leaders of the enterprise. Defendant Jose Campos was a principal lieutenant and advisor of the Marcos'. Defendants Betty Campos, Jeffrey Campos, Simeon Dee, William J. Wright, and Marino K. Tan were active as knowing participants in

forming and operating the enterprise and conducting its activities. Defendants Gray and Hudson were the enterprise's principal members in Texas. The Netherlands Antilles corporate defendants, acting under the direction of the individual defendants, were knowingly involved as members of the enterprise. The enterprise had an existence separate from the individual members and from the acts of racketeering alleged herein.

40. From in or about 1971, and continuing to the present day, and specifically within the past five years, the individual defendants and the Netherlands Antilles corporate defendants did knowingly and willfully commit, and aid and abet in the commission of, and conspire to commit, offenses against the United States that also constitute acts of racketeering within the meaning of 18 U.S.C. § 1961. These offenses were committed as part of a pattern of racketeering, in that they (a) consist of two or more individual offenses, (b) were committed with the express intention and common design and purpose of defrauding, bilking, swindling and stealing from the Republic of the Philippines to the personal use and profit of Ferdinand and Imelda Marcos and their co-schemers, including the individual and the Netherlands Antilles corporate defendants.

41. The individual and Netherlands Antilles corporate defendants committed the offenses more particularly alleged below as a pattern of racketeering, through which they conducted and participated in the conduct of the enterprise, in violation of 18 U.S.C. § 1962(c).

42. The individual and Netherlands Antilles corporate defendants committed the offenses more particularly alleged below with the intention and result of investing the proceeds of their illegal activity in the enterprise in order to further its unlawful purpose of defrauding, bilking, swindling and stealing from the Republic of the Philippines and concealing and covering up such conduct, in violation of 18 U.S.C. § 1962(a).

43. The individual and Netherlands Antilles corporate defendants conspired to violate 18 U.S.C. § 1962(a) and (c), in violation of 18 U.S.C. § 1962(d), by personally agreeing to commit at least two predicate acts and by committing every other element of the offense described in 18 U.S.C. § 1962(d).

44. The acts of racketeering committed and agreed to be committed by the defendants include, but are not limited to, the following:

- a. From in and about 1971, and continuing to the present day, the defendants knowingly and willfully

devised a scheme and artifice to defraud the Republic of the Philippines of money, property, funds, credits, and other things of value, and of its rights to have its governmental and business affairs conducted free from fraud, graft, and theft. As part of the said scheme and artifice to defraud, moneys, credits and other things of value destined for the use and benefit of the Republic of the Philippines, including those originating in the United States, would be diverted and converted to the use of Ferdinand and Imelda Marcos and the use of others, by the direction of the said Ferdinand and Imelda Marcos and others acting in concert with them. These moneys, credits and other things of value would then be invested, by the use of dummy corporations based in areas (such as the Netherlands Antilles) having bank secrecy laws, in various locations including the State of Texas. It was a part of said scheme and artifice that the defendants would and did use the Netherlands Antilles corporate defendants, and other corporate entities, to cover up and conceal their unlawful purpose. It was further a part of the said scheme that the defendants would sell, transfer, invest and reinvest the proceeds of the various investments made using funds stolen by them

from the Republic of the Philippines. In furtherance of the said scheme and artifice, the defendants repeatedly used the mails and wires, all in violation of 18 U.S.C. §§ 1341, 1343.

b. From in or about 1971, and continuing to the present day, the defendants transported stolen money, funds, and other things of value in interstate and foreign commerce from outside the State of Texas to places within the State of Texas, including places within this judicial district, knowing the same to have been stolen. The stolen property thus transported included some of the proceeds of the thefts and swindles described above. The stolen property was then invested, using the Netherlands Antilles corporate defendants, in property in Texas, in violation of 18 U.S.C. § 2314.

45. The money, funds, credits, and other things of value fraudulently appropriated and/or transported by the defendants exceeded five hundred million dollars (\$500,000,000.00). The offenses committed, the transportations done, and the investments made in Texas, as above alleged, exceeded fifty million dollars (\$50,000,000.00).

46. The real properties in Texas (collectively referred to as the "Texas properties") acquired by the defendants using funds obtained by fraud and theft from the

Republic of the Philippines include, but are not limited to the following:

a. The residential, commercial and hotel properties in Nueces County, Texas, whose descriptions are listed on Exhibit A to this complaint;

b. The following real properties in Tarrant County, Texas:

(i) 871.2 acres in the name of Pender Investment Corporation, N.V., as recorded in Vol. 6540, p. 590 in the Deed Records of Tarrant County;

(ii) 484.2 acres bought in the name of George T. Lee and immediately sold to Langley Investment Corporation N.V., as recorded in Vol. 6650, pp. 907 and 912, in the Deed Records of Tarrant County;

(iii) 130 acres bought in the name of Richard A. Gray and two days later sold to Revelstoke Investment Corporation N.V., as recorded in Vol. 6922, pp. 259 and 265 in the Deed Records of Tarrant County;

(iv) 339.5 acres in the name of Ellesmere Investment Corporation N.V., as recorded in Vol. 6617, p. 99 in the Deed Records of Tarrant County;

(v) 249.435 acres in the name of Breton Property Corporation, N.V., as recorded in Vol. 6492, p. 110 in the Deed Records of Tarrant County;

(vi) 740 acres in the name of Breton Property Corporation, N.V., as recorded in Vol. 6256, p. 349 in the Deed Records of Tarrant County;

(vii) 13.5 acres in the name of Cordillera Investment Corporation N.V., as recorded in Vol. 7015, p. 743 in the Deed Records of Tarrant County;

(viii) 624 acres in two parcels bought in the name of James S. Hudson and sold to Kelowna Investment Corporation N.V. and Penticton Investment Corporation N.V., as recorded in Vol. 6766, pp. 2298, 2308, 2311 and 2321 in the Deed Records of Tarrant County, and then sold to Richard A. Gray, as recorded in Vol. 7567, p. 676 in the Deed Records of Tarrant County;

(ix) 298 acres in the name of UNAM Investment Corporation N.V., as recorded in Vol. 6612, p. 602 of the Deed Records of Tarrant County;

(x) 945.9 acres in the name of Vernon Investment Corporation N.V., as recorded in Vol. 6342, p. 749 of the Deed Records of Tarrant County;

(xi) 402 acres in the name of Transconti Investment Corporation N.V., as recorded in Vol. 6184, pp. 726 and 735 in the Deed Records of Tarrant County;

c. Parcels of real properties totaling approximately 900 acres in Bexar County, Texas, in the names of Melville Investment Corporation, N.V. and Haney Investment Corporation, N.V. as recorded in Vol. 1397 and other volumes of the Deed Records of Bexar County.

d. Other real properties in Nueces, Tarrant and Bexar Counties, Texas and real properties in Denton and Harris Counties, Texas.

47. The defendants used Texas banking, title insurance, title search, investment, wire transfer and other facilities to carry out their unlawful activities.

48. The defendants are continuing to commit the acts alleged above, and to engage in acts of concealment and coverup designed to frustrate the plaintiff's right to

recovery including sales or transfers of interests to real properties in Texas held in their name.

49. By reason of the defendants' actions, plaintiff has been damaged in its business and property in an amount as yet undetermined but at least five hundred million dollars (\$500,000,000.00).

Second Claim: Conversion

50. Plaintiff realleges and incorporates paragraphs 1 through 49, above.

51. Defendants have converted plaintiff's property. Defendants have wrongfully exerted acts of dominion over money, funds, credits and properties owned by the Republic of the Philippines, in denial of or inconsistent with the rights of the Republic of the Philippines. Such wrongful acts of dominion include the use of moneys belonging to the Republic of the Philippines, not for the lawful purposes of the Republic of the Philippines, but to acquire properties for defendants' personal use and benefit and in their names. Such properties include the Texas properties listed in Paragraph 46 above and in Exhibit A.

52. Plaintiff has been damaged by such conversion in an amount estimated to exceed five hundred million dollars (\$500,000,000.00). Such conversion was willful and intentional, without cause or excuse, and therefore plaintiff is

entitled to punitive damages in the amount of one billion dollars (\$1,000,000,000.00).

Third Claim: Fraud, Breach of Trust

53. Plaintiff realleges and incorporates paragraphs 1 through 52, above.

54. Ferdinand Marcos and Imelda Marcos owed a fiduciary duty to plaintiff, the Republic of the Philippines, by virtue of the offices they held with the Republic of the Philippines. This duty arose prior to and independent of the various transactions that are the subject of this complaint. This duty included, but was not limited to, the obligation to use the money, funds, credits and property under their control and belonging to plaintiff for the exclusive use and benefit of plaintiff.

55. All defendants were aware of the said duty.

56. All defendants, with knowledge of the said duty and the intent to violate it and to aid in violating it, participated in converting money, funds, credits and other things of value which belonged to the plaintiff Republic of the Philippines to their own use.

57. Defendants Ferdinand and Imelda Marcos gained control of the money, funds, credits and properties used by them to acquire the Texas properties by cheating and

deceiving the people and officials of the Republic of the Philippines and officials of the United States, including by misrepresenting that the money, funds, credits and properties would be and were being used for lawful public purposes for the Republic of the Philippines, and by failure to disclose their intent and plan to divert the money, funds, credits and properties to their private use and benefit. These misrepresentations were material, made with intent to deceive, and were relied upon.

58. The other defendants knowingly took advantage of those frauds by defendants Ferdinand and Imelda Marcos and benefitted by them, taking profits, commissions, fees, salaries and interests in real estate in connection with the acquisitions and sales of the Texas properties.

59. Among the actions taken by defendants in violating the said duty was to purchase and to hold in their own names certain real properties. Some of these real properties are listed in Paragraph 46 above and in Exhibit A, attached hereto and incorporated herein by this reference.

60. The defendants acquired those properties in part by means of false representations thereof that defendants owned the funds or properties used to purchase or trade for the properties or by concealing by silence the facts that defendants were using funds or properties owned by the

Republic of the Philippines. Defendants' frauds and breach of trust alleged above have damaged plaintiff in the amount of at least five hundred million dollars (\$500,000,000.00). The frauds and breach of trust were willful and intentional, without cause or excuse, and therefore plaintiff is entitled to punitive damages in the amount of one billion dollars (\$1,000,000,000.00).

Fourth Claim: Civil Conspiracy

61. Plaintiff realleges and incorporates paragraphs 1 through 60, above.

62. Each of the defendants combined and agreed with the other defendants to accomplish unlawful purposes or lawful purposes through unlawful means including but not limited to defrauding the Republic of the Philippines of money, funds, credits and properties belonging to the Republic of the Philippines, converting such money, funds, credits and properties to their own use, and using them to acquire the Texas properties.

63. Defendants' conspiracy to defraud plaintiff alleged above has damaged plaintiff in the amount of at least five hundred million dollars (\$500,000,000.00).

64. Each defendant's participation in the conspiracy alleged above was intentional without cause or excuse, and

therefore plaintiff is entitled to punitive damages in the amount of one billion dollars (\$1,000,000,000.00).

Fifth Claim: Unjust Enrichment/Constructive Trust

65. Plaintiff realleges and incorporates paragraphs 1 through 64, above.

66. Defendants obtained money, funds, credits and other property belonging to the plaintiff Republic of the Philippines and used it to acquire the Texas properties, all through conversion, fraud, civil conspiracy and other unlawful means. It is therefore unconscionable for defendants to retain the Texas properties and proceeds of the sale of the Texas properties. Unless a constructive trust is imposed upon the Texas properties and proceeds, defendants will be unjustly enriched at plaintiff's expense.

67. Defendants hold the Texas properties and proceeds in a constructive trust for the plaintiff.

Sixth Claim: Accounting

68. Plaintiff realleges and incorporates paragraphs 1 through 67, above.

69. Defendants have not accounted to plaintiff, the Republic of the Philippines, for the value of the money, funds, credits and properties of plaintiff taken by

defendants for their own use and benefit. Defendants owe plaintiff an accounting therefor.

Seventh Claim: Subrogation

70. Plaintiff realleges and incorporates paragraphs 1 through 69, above.

71. In conducting the affairs of the enterprise, such as buying and selling real property, defendants may have acquired rights or claims for payment from third parties or from each other. To the extent that defendants have a right or claim to payment, secured or unsecured, from third parties or from each other, plaintiff should be substituted in the place of defendants as the equitable holder of such claim or right under the doctrine of subrogation.

Prayer for Relief

WHEREFORE, plaintiff prays:

1. For a preliminary injunction, restraining each of the defendants from transferring, selling, encumbering or otherwise dealing in any real or personal properties held in Texas in their names or under their authority, except upon prior order entered by this Court after notice and hearing;

2. For actual damages in an amount of at least \$500,000,000.00, jointly and severally, trebled in accordance with 18 U.S.C. § 1964;

3. For punitive and exemplary damages in an amount of at least one billion dollars (\$1,000,000,000.00).

4. For an accounting.

5. For an order decreeing that the money, funds, properties and other things of value held in Texas by defendants, in their names or under their authority, are in fact beneficially owned by plaintiff and subject to a constructive trust in favor of plaintiff and that they be conveyed to plaintiff forthwith.

6. For an order decreeing that any and all rights or claims for payment, including any security interests in property associated with such claims, which are held by defendants, resulting from or related to the affairs of the illegal enterprise or activities alleged in this complaint, are in fact rights and claims of plaintiff and plaintiff shall be substituted in the place of defendants as the holder of any such rights or claims.

7. For reasonable attorney fees and costs of suit.

8. For such other and further relief to which plaintiff may show itself justly entitled.

Morton Stavis
Michael Ratner
Center for
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853 Broadway
New York, NY 10003

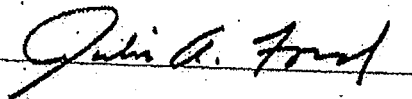
Respectfully submitted,

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By



ATTORNEYS FOR THE REPUBLIC OF
THE PHILIPPINES

Plaintiff demands a jury trial as to all claims so triable.