

2. In May 2014, the Carpenters, led by Defendant Coryell Sr., refused to sign a Customer Satisfaction Agreement (“CSA”) that four other recognized and respected unions agreed to sign in order to improve customer service and increase bookings, business, and jobs at the Pennsylvania Convention Center. MRCC willingly chose to take this rogue action despite having been repeatedly advised that if it failed to join with the other unions that provide show labor at the Convention Center in agreeing to these customer service standards, its members would no longer be called for assignments at the Convention Center, and the work formerly performed by the Carpenters would be assigned to other show labor workers on site. Despite these warnings, Defendant Coryell Sr. declared that MRCC would never sign the CSA, and threatened that there would never be peace at the Convention Center if the PCCA chose to implement that agreement.

3. MRCC’s belligerent brinkmanship failed and its bluff was called. After the deadline for signing the CSA passed with no signature from MRCC, the PCCA assigned the work that the Carpenters had abandoned to other show labor workers within the Convention Center.

4. Publicly embarrassed and privately infuriated at having led their rank and file down such a disastrous path, the leadership of MRCC, including the individual Defendants named herein, hatched a scheme to force the PCCA to abandon the CSA and surrender work performed by other hard-working union members to the Carpenters through a campaign of illegal violence and intimidation aimed at the PCCA and others associated with the Convention Center, including customers, exhibitors, vendors and contractors, and members of other unions.

5. Defendants’ pattern of racketeering activity included illegal and disruptive mass picketing and protests; physical intimidation, harassment, stalking, and assault and battery; verbal intimidation, harassment, race-baiting, and threats; and the destruction of property.

6. Through this extended pattern of extortionate conduct, MRCC sought to force the PCCA to surrender valuable property rights through force and fear. These property rights included without limitation the rights and economic advantage granted to the PCCA under the CSA; the right to be free from being forced to accept unwanted, unnecessary, or fictitious work; the right to control and operate its business free from unlawful coercion; and the right to choose who to allow into and who to exclude from the Convention Center property for the purpose of serving its customers and exhibitors.

7. Defendants' extortionate acts have inflicted substantial economic damage upon the PCCA, and thereby the taxpayers of this Commonwealth, in the form of property damage, lost business, and added expenses for security, customer and exhibitor relations, and legal fees. By this action, the PCCA now seeks to recover these costs and put an end to Defendants' pattern of extortionate conduct.

JURISDICTION AND VENUE

8. This Court has subject matter jurisdiction over this action pursuant to 18 U.S.C. § 1964. This Court also has supplemental jurisdiction over the PCCA's state law claim pursuant to 28 U.S.C. § 1367.

9. Venue is proper in this judicial District pursuant to 18 U.S.C. § 1965 and 28 U.S.C. § 1391, in that Defendants are subject to personal jurisdiction in this District, reside in this District, and/or transact affairs in this District.

PARTIES

10. The PCCA is an agency and instrumentality of the Commonwealth of Pennsylvania, created for the purpose of developing and operating the Convention Center. The PCCA maintains offices at 1101 Arch Street, Philadelphia, Pennsylvania.

11. Defendant Metropolitan Regional Council of Carpenters (“MRCC” or “Carpenters”) is an unincorporated labor organization which maintains offices at 1803 Spring Garden Street, Philadelphia, Pennsylvania. The MRCC is a powerful and well-heeled organization, reporting over \$134 million in net assets or fund balances on its 2013 Form 990.

12. Defendant Edward Coryell Sr. is an individual residing in the State of New Jersey at 404 N. Princeton Avenue, Wenonah, New Jersey. Defendant Coryell Sr. is the Executive Secretary-Treasurer and Business Manager of MRCC. As such, he regularly conducts his business affairs in this District, including the illegal conduct giving rise to the claims herein. Coryell Sr. is well-paid for his work on behalf of MRCC, which reported on its 2013 Form 990 that he received \$504,517.00 in compensation that year. In addition to his position with MRCC, at all relevant times described herein Coryell Sr. was also a member of the PCCA Board of Directors.¹

13. Defendant Edward Coryell Jr. is an individual residing in the State of New Jersey at 51 Mill Road, Swedesboro, New Jersey. Defendant Coryell Jr. is the Assistant Executive Secretary-Treasurer and a Business Agent of MRCC. Defendant Coryell Jr. regularly conducts his business affairs in this District, including the illegal conduct giving rise to the claims herein. MRCC reported on its 2013 Form 990 that Defendant Coryell Jr. received \$268,314.00 in compensation that year.

14. Defendant J.R. Hocker is an individual residing in the State of New Jersey at 824 Green Avenue, Williamstown, New Jersey. Defendant Hocker is an Organizer of MRCC. Defendant Hocker regularly conducts his business affairs in this District, including the illegal conduct giving rise to the claims herein.

¹ The PCCA does not bring this Complaint against Defendant Coryell Sr. in his capacity as a member of the PCCA Board of Directors, but rather as a person employed by or associated with MRCC.

15. Defendant Richard Rivera is an individual who maintains a business address at 1803 Spring Garden Street, Philadelphia, Pennsylvania. Defendant Rivera is an Organizer of MRCC. Defendant Rivera regularly conducts his business affairs in this District, including the illegal conduct giving rise to the claims herein.

16. Defendant Ronald Curran is an individual residing in the Commonwealth of Pennsylvania at 2824 S. Beulah Street, Philadelphia, Pennsylvania. Defendant Curran is a member of MRCC. Defendant Curran regularly conducts his business affairs in this District, including the illegal conduct giving rise to the claims herein.

17. Defendant Kenyatta Bundy is an individual residing in the Commonwealth of Pennsylvania at 4044 Bennington Street, Philadelphia, Pennsylvania. Defendant Bundy is a member of MRCC. Defendant Bundy regularly conducts his business affairs in this District, including the illegal conduct giving rise to the claims herein.

18. Defendant Richard Washlick is an individual residing in the State of New Jersey at 237 Greenwich Avenue, Paulsboro, New Jersey. Defendant Washlick is a member of MRCC. Defendant Washlick regularly conducts his business affairs in this District, including the illegal conduct giving rise to the claims herein.

19. Defendants Does 1-10 are unidentified individuals who are members of MRCC and who engaged in or contributed to the violations of law described herein. Among other illegal and extortionate activity, Does 1-10 participated in the violence, intimidation, assault, and destruction of property that occurred during the “Black Tie Tailgate” event held at the PCCA in conjunction with the Philadelphia Auto Show on January 29, 2015, and on the floor of the Auto Show itself on February 7, 2015.

FACTS

The PCCA, the Convention Center, and the CSA

20. As the operator of the Convention Center, the PCCA is responsible for ensuring that the Center offers exhibitors and customers all that they need to stage and enjoy the various shows and conventions that take place there. The Convention Center currently has 1.3 million-square feet of space, including 528,000-square feet of continuous exhibit space, 79 meeting rooms, 7 exhibit halls and a 31,512-square foot ballroom, 34,960-square foot Grand Hall and a second 55,000-square foot Terrace Ballroom, which is the largest on the Northeast corridor. The Convention Center has generated more than \$2 billion in convention-related spending and \$225 million in tax revenues since opening in 1993.

21. In 2003, the PCCA determined that the best way to ensure predictability, safety, consistency, uniformity, and cost effectiveness for its customers, exhibitors, and all those working at the Convention Center was to limit the work that customers and exhibitors may perform on their own and require that they engage a designated labor supplier for such show labor necessary to put on their shows and meetings. That concept was memorialized in a ten-year Customer Satisfaction Agreement (“CSA”).

22. The CSA is a right of entry contract that governs the performance of show labor work at the Convention Center, and provides limitations upon exhibitors and customers. In order to enter the premises of the Convention Center, customers, contractors, exhibitors, and labor organizations all must comply with the terms of the CSA. Among other things, the CSA attached and incorporated the PCCA’s Code of Conduct, which outlines the rules of conduct for all those working at and visiting the Convention Center.

23. In May 2014, after more than a year of discussions with the parties to the original CSA which had expired in 2013, the PCCA offered all of these parties, including the Carpenters,

the opportunity to enter into a revised customer satisfaction agreement, again incorporating the Code of Conduct.

24. As both a member of MRCC and a member of the PCCA Board of Directors, Defendant Coryell Sr. was intimately familiar with, and indeed directly involved in, the discussions and planning leading up to the renewal of the CSA. In his capacity as Business Manager of the MRCC, Defendant Coryell Sr. acknowledged receipt of the new CSA offer – which, just as in 2003, included a firm, 48-hour deadline in which to sign and return the new CSA – in a letter to the PCCA dated May 5, 2014.

25. At a PCCA Board meeting held on May 6, 2014, Defendant Coryell Sr. declared to the other members of the Board that he was adamantly opposed to and would never sign the CSA. Defendant Coryell Sr. threatened that if the Board moved forward with implementation of the new CSA, there would never be labor peace at the Convention Center.

26. Defendant Coryell Sr.'s threat was not long in being realized. The same day he declared that there would be no peace at the Convention Center of the PCCA implemented the CSA, at least one member of the PCCA's management had his automobile vandalized while it was parked at the facility.

27. Despite Defendant Coryell Sr.'s threats and the accompanying vandalism, the PCCA signed the new, binding, ten-year CSA on May 6, 2014. The other parties to this agreement are SMG, the private manager of the Convention Center; Elliott-Lewis Corporation ("Elliott-Lewis"), a private company that contracts with the PCCA to serve as the labor supplier at the Convention Center; and four labor unions whose members are engaged by Elliott-Lewis and who perform show labor at the Convention Center: the International Brotherhood of Electrical Workers, Local 98 ("Electricians"), the Laborers' International Union of North America, Local 332 ("Laborers"), the International Alliance of Theatrical Stage Employees

Artist and Allied Crafts of the United States and Canada, Local 8 (“Stagehands”), and the International Association of Bridge, Structural and Ornamental Iron Workers, Local Union 405 (“Riggers”).

28. Though they were parties to the original CSA signed in 2003, the Carpenters and Teamsters Local 107 (the “Teamsters”) chose not to enter into the renewed version of that agreement by the deadline announced by the PCCA.

29. Because MRCC chose not to timely sign the CSA, its members have not been called to work in the Convention Center since that agreement took effect. Under the terms of the CSA – and as the Carpenters were well aware when they chose not to sign it – Elliott-Lewis may only supply customers and exhibitors at the Convention Center with workers represented by the unions that are parties to the CSA. Accordingly, after the CSA was ratified by the PCCA’s Board, the Board directed the PCCA’s Chief Executive Officer and SMG to move forward with realignment of work assignments within the jurisdictional portion of the CSA in order to reconfigure the jurisdictions based on the four unions that signed that agreement.

30. Thus, the Electricians, Laborers, Stagehands, and Riggers currently perform all show labor work at the Convention Center. The reconfigured jurisdictions went into effect following the expiration of the Carpenters’ and Teamsters’ collective bargaining agreements on May 10, 2014, at which time the Carpenters and Teamsters were no longer eligible to be assigned work by Elliott-Lewis within the Convention Center.

31. Not until *after* the work jurisdictions were reconfigured and show labor given to the four signatory unions did the Carpenters provide the PCCA’s CEO with an executed copy of the new CSA, demanding that the work they had walked away from be taken away from other union workers. The PCCA refused to accede to this demand.

32. Since then, and at Defendant Coryell Sr.'s direction, Defendants have engaged in the related and continuous pattern of extortionate racketeering activity, detailed below, intended to force the PCCA to breach and abandon the CSA, reassign work given to other union workers engaged at the Convention Center under that agreement and award that show labor work to the Carpenters, and permit the Carpenters to enter the Convention Center and provide show labor services to the PCCA's exhibitors and customers.

Defendants Orchestrate Illegal Mass Picketing and Harassment to Disrupt Key Shows

33. Shortly after their demand for re-entry into the Convention Center was denied, Defendants conceived an extortionate plan to disrupt key shows scheduled to take place at that facility through a series of illegal mass pickets.

34. On May 10, 2014 – the day the new CSA went into effect – MRCC agents engaged in mass picketing at the Convention Center. The PCCA was forced to engage private security at an enormous cost and call the Philadelphia police in order to respond to this intimidating and disruptive display of force.

35. On July 25, 2014, roughly 100 agents of MRCC blocked the intersection of 12th and Arch streets in front of the Convention Center. MRCC agents were chanting slogans on megaphones, blaring air horns and whistles, and blocking traffic around the Convention Center for a substantial period, including emergency and police vehicles. This intimidating and unlawful display created a major disturbance in one of Center City's busiest intersections, and impeded access to the Convention Center for the PCCA's customers, vendors, and exhibitors.

36. In August 2014, MRCC agents, including but not limited to Defendant Hocker, massed near entrances to the Convention Center for the purpose of intimidating employees, patrons, and vendors as they attempted to enter the building.

37. On several occasions, upon information and belief, MRCC agents harassed, physically assaulted, and threatened show labor workers outside the Convention Center.

38. Commencing in or around August 2014, MRCC agents, numbering approximately 25 to 50 individuals at a time and including Defendants Coryell Jr., Hocker, and Rivera, began to systematically assault and intimidate PCCA and Convention Center management as they attempted to enter or leave the Convention Center property. MRCC agents stalked building management and harassed them by loudly blowing whistles and air horns close to their persons, using profane and vulgar language, and acting in a physically menacing and intimidating fashion, intentionally and maliciously putting PCCA management and employees in fear of bodily harm. At least one PCCA employee sought medical attention after one of these attacks.

39. MRCC agents also began to ostentatiously videotape members of building management as they entered and exited the building in an obvious attempt to oppress and intimidate them. Building management felt threatened by this behavior and feared for their personal safety.

40. On August 15, 2014, MRCC agents again encircled the Convention Center in another unlawful protest, disrupting street and pedestrian traffic, including emergency and police vehicles.

41. Yet again on September 12, 2014, approximately 50 MRCC agents surrounded the Convention Center, once again disrupting all vehicular and pedestrian traffic.

42. MRCC's disruptive and threatening mass picketing activity continued in October 2014. For example, on October 18, 2014, approximately 40 MRCC agents picketed the Convention Center, blocking traffic. Once again, the Philadelphia Police Department had to intervene in order to control and disperse this illegal demonstration.

43. Up to this point, the PCCA's management had operated under the hope and belief that the above-described actions were primarily isolated incidents, not part of any coordinated effort by Defendants, and that they would eventually cease, allowing the Convention Center to resume normal operations. This hope and belief was rudely dispelled by the Carpenters' continued and increasingly aggressive assaults on the Convention Center and its customers in late 2014 and continuing into 2015.

44. For example, on November 7, 2014, roughly 50 MRCC agents led by Defendant Coryell Jr. engaged in an illegal mass demonstration to disrupt and disturb operations at the Convention Center, including the "Kia Ride and Drive" event associated with the Craft Show. The "Kia Ride and Drive" event occurred directly in front of the Convention Center. The Carpenters intentionally disrupted this event by another illegal mass demonstration, which included blocking vehicular traffic. In addition, 10 to 15 MRCC agents harassed and threatened event attendees by blowing whistles directly into their ears and screaming at them at close range, intentionally putting these PCCA customers in fear of bodily harm and destroying any enjoyment they might have taken from the event.

45. On November 15, 2014, between 100 and 200 MRCC agents, led by Defendants Coryell Jr., Rivera, and Hocker, engaged in further illegal mass picketing that blocked traffic around and access to the Convention Center. This mass picketing was timed to disrupt the American Society of Nephrology ("ASN") Kidney Week event being held at the Convention Center. The ASN was forced to re-route shuttle buses transporting attendees because MRCC agents blocked the public intersection leading to the entrance of the Convention Center, preventing the buses from turning the corner to drop the attendees off.

46. This extended pattern of illegal demonstrations, assaults, stalking and harassing behavior was accompanied by public declarations by MRCC and its agents, including the

individual Defendants herein, that this extortionate conduct would continue until the PCCA breached the CSA and abandoned its rights thereunder. Specifically and without limitation, MRCC agents repeatedly and loudly declared during the disruptive pickets and on an MRCC-sponsored Web site, www.fairdealphilly.com, that the Carpenters “were not going anywhere” until the PCCA agreed to take work assignments awarded to other unions under the CSA away from those other union members, give those assignments and wages to the Carpenters, and permit the Carpenters entry to the Convention Center to provide services to the PCCA’s exhibitors and customers.

47. Defendants also used the popular classified advertisement Web site craigslist.com as another weapon in their war on the PCCA. On or about January 21, 2015, a fraudulent “Help Wanted” advertisement appeared on that site, calling for applicants to apply for work at the Convention Center. The bogus listing detailed the type of work that would need to be done, offered substantial hourly and overtime wages, and encouraged respondents to “apply in-person at the Elliott-Lewis labor services window.” *See* Exhibit 1. The intentionally false advertisement resulted in a voluminous number of calls and numerous in-person inquiries, causing the PCCA to waste resources in response. After the PCCA reported the inaccurate nature of the posting to craigslist, the Web site removed the announcement.

48. Upon information and belief, this fake ad was placed by a member or agent of MRCC in order to embarrass and harass the PCCA and disrupt its operations. Unlike the general public, the Carpenters are intimately familiar with work at the Convention Center, including the existence of the “Elliott-Lewis labor services window” described in the ad. Only the Carpenters were engaged in a prolonged campaign to pressure the PCCA and disrupt its operations – a campaign that took a particularly violent and disturbing turn within a week of the ad’s appearance.

Defendants Violently Disrupt the Auto Show

49. When their pattern of multiple illegal mass pickets and assaultive and harassing behavior failed to force the PCCA to accede to their demands, Defendants hatched a scheme to inflict even greater fear, intimidation, and economic harm on the PCCA by violently disrupting the Philadelphia Auto Show.

50. The annual Auto Show is one of the largest and most important events that the Convention Center hosts. Approximately 30 exhibitors and 300,000 attendees – including many residents of the Delaware Valley – participate in this event each year. Knowing this, Defendants conspired to escalate their disruptive exterior mass picketing to include interior mass picketing and vandalism within this prominent and popular show.

51. The 2015 Philadelphia International Auto Show began on January 28, 2015. One of the premier “kick-off” events associated with the 2015 Auto Show was the “Black Tie Tailgate,” a formal dinner-dance and preview of the Auto Show sponsored by the Auto Dealers CARing for Kids Foundation. Proceeds from this charity event were used to benefit the Division of Neonatology at The Children’s Hospital of Philadelphia.

52. The Black Tie Tailgate was held on Friday January 30, 2015. At approximately 5:30 that evening, 80 to 100 members of MRCC gathered outside of the Convention Center where attendees of the Tailgate event were to disembark from their vehicles at a valet parking stand and enter the event through a red carpet entrance. Many of the Carpenters present appeared to be drunk; all were belligerent.

53. As the attendees to the Tailgate event drove up to and attempted to enter the PCCA through the designated entrance, the assembled mob of MRCC agents surrounded their vehicles, pounded on the windows and doors, and made rude and obscene comments to the occupants in a highly offensive and intimidating manner. Other MRCC members blocked access

to the valet stand, preventing guests from leaving their cars and causing extended delays and disruptions.

54. As those PCCA guests who were able to park their cars attempted to cross the red carpet and enter the show, they were forced to run another gauntlet of obscene abuse from drunken Carpenters hanging over the restraining barricades nearby. Videos taken at the event and prominently featured on MRCC's Web site clearly show the fear and intimidation in the eyes of the Carpenters' innocent victims as they simply tried to support a charity event.

55. Defendants were not satisfied with simply using fear and force outside of the Convention Center to attempt to extort compliance with their demands from the PCCA. On February 6, 2015, MRCC agents purchased approximately 200 tickets to the Auto Show. Defendants did not purchase these tickets for the legitimate purpose of enjoying the show, but for the unlawful purposes of committing vandalism and preventing others from enjoying the occasion by forcefully disrupting the event.

56. Defendants planned their campaign of violence and intimidation in detail and well in advance. As demonstrated on a map of the Auto Show floor that the PCCA secured from a Carpenters operative who participated in this raid, they divided their force of MRCC agents into three teams, each assigned a color-coded name and a set list of exhibitors to obstruct, intimidate, and harass. *See Exhibit 2.*

57. This map shows that one of the color-coded teams, the "Orange" team, was led by Defendant Bundy, and was responsible for disrupting the following exhibitors: Mazda, Lincoln, Infiniti, Cadillac, Buick, Volvo, Audi, Land Rover, Jaguar, Nissan, Acura, Mini-Cooper, BMW, Mercedes-Benz, and Lexus. *Id.*

58. Consistent with their pre-orchestrated plan, MRCC's agents infiltrated the Convention Center and seized and disrupted the Auto Show through a variety of violent and obstructive tactics on February 7, 2015.

59. Some Carpenters locked themselves inside exhibitor vehicles and refused to come out, intentionally preventing paying customers from entering or inspecting those vehicles. Others crowded around vehicles displayed for customer viewing, further blocking access to those vehicles by paying customers. Under the concealment of their counterparts, MRCC agents tampered with and damaged exhibitor vehicles – removing engine covers and fuses, ripping out wiring harnesses and stealing oil and gas caps, and stuffing large amounts of leaflets calling for the PCCA to end the supposed “lockout” of the Carpenters by firing existing union show workers and giving that work to the Carpenters. *See* Exhibit 3. In addition, the flyers inaccurately described the existing union show workers as “lesser-qualified” and “inexperienced,” while also outrageously calling on Auto Show patrons to “tell the vendors you will be buying your car from somebody else . . . someone who *supports* the working man!” *See* Exhibit 4 (emphasis in original).

60. A series of confrontations arose between the invading Carpenters and the exhibitors whose valuable displays they were obstructing, disrupting, and destroying. The Carpenters either ignored repeated requests to stop their unlawful behavior or reacted in a menacing and aggressive manner toward the exhibitors.

61. At one point, when five Carpenters who had been involved in stuffing exhibitor vehicles with MRCC flyers were asked to leave the premises, Defendant Curran angrily instructed them to kick over a nearby Auto Show sign. When Defendant Curran himself was asked to leave by building management and show security, he belligerently refused. Ultimately, the police were called to remove Defendant Curran from the Convention Center.

62. Defendant Doe 1, an unidentified individual who is an MRCC member, was tasked with disrupting the BMW booth. Defendant Doe 1 opened cars and stuffed flyers in numerous parts of the cars including the dash boards, trunks, windshield wipers, floor boards and glove compartments. When a BMW product specialist approached Defendant Doe 1 and asked him to stop placing flyers in the cars, Defendant Doe 1 brought his forearm into her chest, violently pushed her away, and exclaimed that he was not doing anything wrong. After this incident, BMW was forced to lock most of their vehicles to prevent further vandalism, denying paying customers the ability to enjoy the vehicles' interiors. *See Exhibit 5*, which includes photographs of Defendant Doe 1 at Exhibit A thereto.

63. Defendants Does 2 and 3 were assigned to disrupt the Nissan booth. Defendants Does 2 and 3 entered Nissan's platform vehicle, the Nissan Murano, and shoved multiple flyers in different parts of the car, including inside the sun roof, front dash, door pockets, cup holders, glove box, and sun visors. *See Exhibit 6*, which includes a photograph of Defendants Does 2 and 3 at Exhibit A thereto .

64. When the manager of the Nissan exhibit asked Defendants Does 2 and 3 to get out of the car, they refused, instead locking themselves in the car, and videotaping customers in the booth. When one customer asked Defendant Doe 3 to stop this videotaping, he responded with a profane gesture. Ultimately, building management and show security had to be called to remove Defendants Does 2 and 3 from the car. *See id.*

65. In the wake of Defendants' assault on the Nissan exhibit, all 18 display vehicles were covered in 500 to 600 Carpenters flyers that the Nissan representatives were forced to remove and discard. Multiple attendees complained that these activities interfered with their enjoyment of the Auto Show. *See id.*

66. Defendant Doe 4, together with 6 to 8 other MRCC agents, was tasked with disrupting the Subaru booth. Defendant Doe 4 and the other MRCC agents placed hundreds of flyers in Subaru cars and stood in the middle of the booth in a threatening posture, staring down other paying attendees. The event liaison for the booth approached these individuals and gave some of their flyers back to them, but was too intimidated by their belligerent attitude and demeanor to ask them to leave. Despite this, the Carpenters began to harass and threaten the liaison, warning that he needed to “watch [it]” and that “it is going to go down.” *See* Exhibit 7. In the midst of this harassment, Defendant Doe 4 locked himself in a Subaru STI. He was asked to leave several times, but refused. Ultimately, security guards had to remove him. *See id.*, which includes a photograph of Defendant Doe 4 at Exhibit A thereto.

67. Yet other MRCC agents damaged exhibitor vehicles, particularly vehicles at the Cadillac and Buick booths. In addition to removing caps and fuses and ripping out wiring harnesses, MRCC agents jammed caps and fuses into vehicle engines, removed plastic engine covers, and in one instance jammed a Coca-Cola bottle into the hood of a Buick so that the hood could not be opened. *See* Exhibits 8, 9.

68. The Carpenters also damaged the interior of display vehicles, ripping out black rubber trim and plastic coverings. *See* Exhibit 9.

69. Although the PCCA asked the Philadelphia Police Department to protect its property and that of its exhibitors from these attacks, the extortionate conduct continued under the direction of Defendants Bundy and Curran because the responding officers were unable to cover and control the 1.3 million-square feet within which it was taking place. *See* Exhibit 10.

70. All of these acts were orchestrated by Defendants Coryell Sr. and Coryell Jr.

71. In response to the Carpenters’ repeated and brazen assaults on the PCCA and its exhibitors and customers, the PCCA was forced to file a civil action against MRCC and

Defendants Coryell Sr., Bundy, Curran, and Defendants Does 1-4 as described herein to obtain emergency injunctive protection against further attacks during the remainder of the Auto Show.

72. In addition to the legal fees incurred in responding to Defendants campaign of coercion and fear, the PCCA sustained damages in the form of increased security costs to respond to and guard against Defendants' illegal and disruptive behavior, as well as expenses incurred in reimbursing angry and frightened customers and exhibitors whose personal safety was threatened and property destroyed by Defendants and others acting at their direction.

Defendants' Coercive Conduct Continues

73. Despite previously being under a court order to refrain from further extortionate conduct aimed at the PCCA, MRCC and Defendants herein have continue to threaten further disruptive and unlawful acts.

74. For example, on February 17, 2015, MRCC directly threatened the Flower Show, tweeting the following from their @MRCCarpenters Twitter handle: "Protests @PAConvention will continue even during @PhilaFlowerShow! Lockout hurts everyone. Plant seeds of fairness! owl.li/J9HQ7."

75. As a result, the PCCA was forced to go back to court to obtain a second injunction against Defendants' extortionate conduct.

76. In addition, the fairdealphilly.com Web site continues to broadcast videos of the mass picketing and traffic disruptions and the assault on the Black Tie Tailgate event that, even as sanitized by Defendants, are starkly intimidating. The Web site boasts of this thuggish behavior, and repeatedly states that the Carpenters and their extortionate conduct are "not going anywhere." For example, in a letter on that site directed to potential exhibitors, Defendant Coryell Sr. warns that "Our protests will continue. We are not going anywhere until this unfair and illegal lockout ends, and our members are back at their jobs."

77. In March 2015, MRCC purchased a 4-page insert in the USAE's national, weekly newspaper. The USAE is a print and "e" publication that serves the association meetings community, including the PCCA, with approximately 10,000 subscribers. In its advertisement, MRCC and Defendant Coryell Sr. repeated and expanded upon the false statements found in the flyers distributed during the assault on the Auto Show, namely that "it now costs more to put on shows in Philadelphia because it takes the unskilled replacement workers twice as long to do the work of locked out carpenters." Exhibit 11. Defendant Coryell Sr. also used the insert to again publicize his threat that the Carpenters "are not going anywhere until this unfair and illegal lockout ends." *Id.*

78. In April 2015, after the Democratic National Committee announced its intention to hold the 2016 Democratic National Convention in Philadelphia, Defendant Coryell Sr. sent letters to national and local DNC officials, urging them not to do business with the PCCA. In these letters, Defendant Coryell Sr. accused the PCCA of "illegally lock[ing] out hard working men and women members," when in fact the goal of Defendants' campaign against the PCCA was to deprive other "hard working men and women members" of the Electricians, Laborers, Stagehands, and Riggers of work and wages assigned to them and to seize that property for themselves.

79. Defendants' recent letter-writing campaign has already had its desired effect of inflicting economic damage on the PCCA in the form of lost bookings. On April 12, 2015, the Chester County Democratic Committee advised the PCCA that, in response to Defendant Coryell Sr.'s letter, it would not host or attend any event held at the Convention Center during the Democratic National Convention.

80. In addition to their overtly violent and threatening actions outside of and within the Convention Center, the Carpenters have waged a cruel war of attrition against contractors

attempting to perform work at that facility by bombarding them with labor grievances that, while specious, are expensive and time-consuming to defend. Between June 25, 2014 through August 28, 2014, MRCC filed frivolous grievances against 13 show contractors who performed work at the Convention Center in a deliberate attempt to dilute or deny them any profit from their work, and to coerce these and other contractors to stop working at the Convention Center. *See Exhibit 12.*

81. While MRCC's arbitration demands sought a "make-whole" remedy, including requiring those show contractors to assign work to MRCC in the future, as the Carpenters well knew, the 13 show contractors had neither the ability nor the right to control the assignment of work. *See id.*

82. Because MRCC was well-aware of these facts, making their demands baseless, the 13 show contractors filed Charges with the National Labor Relations Board in November 2014. The Fourth Region of the NLRB consolidated the charges and submitted them to the NLRB's Division of Advice on February 2, 2015. In March 2015, the Division of Advice found that the Charges have merit, and directed the Region to issue a complaint against MRCC. A Consolidated Complaint was filed by the Fourth Region on March 31, 2015, asserting that the Carpenters have committed an unfair labor practice by unlawfully interfering with the contractors' business with the Convention Center and setting a hearing date of May 27 to address MRCC's further extortionate conduct. *See id.*

83. Along the same lines, Defendant Washlick – who performed show work within the Convention Center prior to MRCC's refusal to sign the new CSA – has waged a bitter, racially-charged Facebook campaign against the Laborers, as well as the PCCA.

84. Specifically, in a series of posts, Defendant Washlick has compared the Laborers to the infamous Bloods gang, suggested that the Laborers "should change their symbol to a

broom a shovel a prayer rug and pair of jeans they wore at the club last night,” and called the union’s members “scabs” and “hypocrites.” *See* Exhibit 13. Defendant Washlick has also referred to the Laborers’ Business Manager, Ryan Boyer, as a “rat” and the “head shithead” of that union. *See id.*

85. Furthermore, Defendant Washlick adamantly advocated for illegal action at the Convention Center, writing in another Facebook post that he and his fellow Carpenters should “throwback to the old school” by “blocking the doors again,” while also noting that he “could think of a few people that wouldn’t miss much if they did some jail time” as a result. *See id.*

COUNT I – RICO Section 1962(c)

(All Defendants)

86. The PCCA incorporates by reference all prior allegations as if set forth herein.

87. The PCCA is a “person” within the meaning of 18 U.S.C. § 1961(3).

88. Defendants are each “persons” within the meaning of 18 U.S.C. § 1961(3).

89. Defendants are a group of individuals and a union associated in fact so as to form an “enterprise” for the purpose of extorting and attempting to extort valuable property from the PCCA (the “MRCC Enterprise”) within the meaning of 18 U.S.C. § 1861(4).

90. The MRCC Enterprise was engaged in, and its activities have affected, interstate and foreign commerce.

91. Each of the Defendants agreed to and did conduct and participate, directly and indirectly, in the conduct of the affairs of the MRCC Enterprise through a pattern of racketeering activity within the meaning of 18 U.S.C. § 1961(5) as described herein, in violation of 18 U.S.C. § 1962(c) and 18 U.S.C. § 1951 and for the unlawful purpose of forcing the PCCA to surrender valuable property through force, fear, intimidation, harassment, violence, and threats of violence, all as described herein.

92. The racketeering activity described herein constitutes multiple, related acts that are indictable under the Hobbs Act, 18 U.S.C. § 1951, and are within the scope of 18 U.S.C. § 1961(1)(B) and (5).

93. These predicate acts of racketeering activity are related to the same or similar purposes, results, and participants. They have the same goals, namely, the enrichment of Defendants at the expense of the PCCA, have the same methods of commission, and are otherwise inter-related by distinguishing characteristics. They are not singular or isolated incidents, but are multiple, premeditated acts coordinated as part of a continuous and overarching illegal conspiracy.

94. The goal of this illegal scheme has been, and remains, to force the PCCA to surrender its valuable property rights associated with the CSA and the Convention Center, including:

- a. The rights and economic advantage granted to the PCCA under the CSA;
- b. The right to be free from being forced to accept unwanted, unnecessary, or fictitious work;
- c. The right to control and operate its business free from unlawful coercion; and
- d. The right to choose who to allow entry into and who to exclude from the Convention Center property for the purpose of serving its customers and exhibitors.

95. Defendants' continuous pattern of malicious and illegal conduct has directly and proximately damaged the PCCA and its business and property in multiple ways, including:

- a. Costs associated with increased security and security measures to respond to and protect against Defendants' multiple disruptions of PCCA events and assaults upon PCCA property, customers, exhibitors, vendors, contractors, and employees;
- b. Expenses incurred in reimbursing customers and exhibitors whose personal safety was threatened and property destroyed by Defendants and others acting at their direction;
- c. Canceled shows, lost customers, and lost booking fees; and

d. Legal fees incurred directly and solely in responding to and obtaining protection from Defendants' extortionate conduct.

WHEREFORE, Plaintiff Pennsylvania Convention Center Authority respectfully prays the Court:

- a. To enter judgment against Defendants, jointly and severally, for the full amount of the PCCA's actual damages as proven at trial, together with treble damages, attorneys' fees and cost of suit, and pre- and post-judgment at the maximum legal rate;
- b. For a trial by jury on all issues so triable; and
- c. For such other and further relief as the Court deems just and proper.

COUNT II – RICO Section 1962(d)

(All Defendants)

96. The PCCA incorporates by reference all prior allegations as if set forth herein.

97. As set forth above, Defendants agreed and conspired to violate 18 U.S.C. § 1962(c) by conducting and participating in the conduct of the affairs of the MRCC Enterprise through a pattern of racketeering activity.

98. Defendants have intentionally conspired and agreed to conduct and participate in the conduct of the affairs of the MRCC Enterprise through a pattern of racketeering activity. Defendants knew that their predicate acts were part of a pattern of racketeering activity and agreed to the commission of those acts to further the schemes described above. That conduct constitutes a conspiracy to violate 18 U.S.C. § 1962(c), in violation of 18 U.S.C. § 1962(d).

99. As a direct and proximate result of Defendants' conspiracy, the overt acts taken in furtherance of that conspiracy, and violations of 18 U.S.C. § 1962(d), the PCCA has been injured in its business and property in multiple ways, including:

- a. Costs associated with increased security and security measures to respond to and protect against Defendants' multiple disruptions of PCCA events and

assaults upon PCCA property, customers, exhibitors, vendors, contractors, and employees;

- b. Expenses incurred in reimbursing customers and exhibitors whose personal safety was threatened and property destroyed by Defendants and others acting at their direction;
- c. Canceled shows, lost customers, and lost booking fees; and
- d. Legal fees incurred directly and solely in responding to and obtaining protection from Defendants' extortionate conduct.

WHEREFORE, Plaintiff Pennsylvania Convention Center Authority respectfully prays the Court:

- a. To enter judgment against Defendants, jointly and severally, for the full amount of the PCCA's actual damages as proven at trial, together with treble damages, attorneys' fees and cost of suit, and pre- and post-judgment at the maximum legal rate;
- b. For a trial by jury on all issues so triable; and
- c. For such other and further relief as the Court deems just and proper.

COUNT III – Trespass to Chattels

(Defendants Does 1-4)

100. The PCCA incorporates by reference all prior allegations as if set forth herein.

101. By virtue of hosting the Auto Show and pursuant to its agreements with those exhibiting vehicles at the Auto Show, the PCCA was entitled to exclusive, immediate possession and control of the Auto Show and all exhibits and displays therein.

102. Defendants committed trespass upon the PCCA's chattels by intentionally using or intermeddling with the vehicles in the PCCA's possession and control as described herein.

103. As a direct and proximate result of Defendants' trespass to chattels, the PCCA has suffered damages including, but not limited to, the amounts paid to those exhibiting vehicles for repairs and/or replacements, as well as additional security.

WHEREFORE, Plaintiff Pennsylvania Convention Center Authority respectfully prays
the Court:

- a. To enter judgment against Defendants, jointly and severally, for the full amount of actual damages proven at trial, together with pre- and post-judgment interest thereon at the maximum legal rate;
- b. For a trial by jury on all issues so triable; and
- c. For such other and further relief as the Court deems proper.

Dated: May 7, 2015

Respectfully submitted,

/s Craig D. Mills

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