

## **SUMMARY OF ALLEN V. BEIRICH, POTOK, AND SPLC COMPLAINT**

My complaint, filed in the federal District Court for the District of Maryland, alleges nine causes of actions – nine claims – against three defendants.

The three defendants are the Southern Poverty Law Center, Inc. (“SPLC”); Heidi Beirich, Director of the SPLC’s Intelligence Project; and Mark Potok, former editor in chief of the Intelligence Project’s publication *The Intelligence Report*.

I allege three federal claims:

- For a declaratory judgment that the SPLC has contravened the requirements imposed on 501c3 nonprofits to be eligible for this favored tax status
- A Racketeer and Corrupt Organizations Act (“RICO”) claim under 18 U.S.C. 1962(c) against Beirich and Potok
- A RICO conspiracy claim under 18 U.S.C. 1962(d) against Beirich and Potok.

I allege six state law claims:

- Negligent training and supervision claim against the SPLC
- Tortious interference with prospective advantage, namely, with my employment with the City of Baltimore, against all defendants

- Tortious interference with contract, namely, with a confidentiality agreement, against all defendants
- Aiding and abetting breach of contract, namely, the confidentiality agreement, against all defendants
- Restitution claim against the SPLC
- Defamation claim against all defendants.

I seek compensatory damages of \$1.5 million, for the loss of my employment and damage to my reputation as an attorney. I also seek treble damages as to my RICO claim and punitive damages as to three of my state law claims.