

RECEIVED

FEB 19 2019 *AB*

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

XUEJUN ZOE MAKHSOUS)

Plaintiff,)

v.)

NICHOLAS A. MASTROIANNI II)

YING DING)

and)

US IMMIGRATION FUND, LLC, aka USIF,)
a Delaware limited liability company;)

US IMMIGRATION FUND-NY, LLC, aka the)
Regional Center, a New York limited liability)

company; 701 TSQ1000 FUNDING, LLC, aka 701)
Fund, a Delaware limited liability company; 701)

TSQ 1000 FUNDING GP, LLC, aka 701 Manager)
a Delaware limited liability company; NYC 1000)

INVESTMENT, LLC, aka 701 Fund Co-Manager,)
a Delaware limited liability company; 1568)

BROADWAY FUNDING 100, LLC, aka 702 Fund,))
a Delaware limited liability company;1568)

BROADWAY FUNDING 100 GP, LLC, aka 702)
Fund Manager, a Delaware limited liability company))

NYC 2000 INVESTMENT, LLC, aka 702 Fund)
Co-Manager, a Delaware limited liability company;)

CAPITAL 600 INVESTMENTS, LLC, aka Regional)
Center Co-Manager, a Florida limited Liability)

company; QIAOWAI INTERNATIONALGROUP)
USA, LLC, 4552 Tuscany Dr. Plano, TX; QIAOWAI)

INTERNATIONAL HOLDING, LLC, a Delaware)
limited liability company; QIAOWAI GROUP)

INTERNATIONAL TRAVELAGENCY)
HOLDINGS, INC., and with its Registered agent)

listed as Corporation Service Company, 251 Little)
Falls Dr. Wilmington, DE 19808;)

Defendants.

1:19-cv-01230
Judge Andrea R. Wood
Magistrate Judge M. David Weisman

TRIAL BY JURY DEMANDED

**COMPLAINT PURSUANT TO RACKETEER INFLUENCED AND CORRUPT
ORGANIZATIONS ACT AND OTHER CAUSES OF ACTION**

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that the Court:

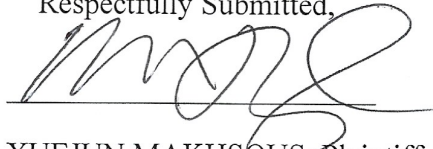
- I. Award in excess of \$120,000 in compensatory damages, consequential, exemplary and punitive damages of \$50 million, not including the trebled damages for the RICO causes of action, against Defendants, each and every one of them jointly and severally.
- II. Enjoin permanently Defendants from interfering business relations between Plaintiff and her clients in their request seeking return of their EB-5 investment in full and with interests.
- III. Award attorneys' fees and other litigation costs reasonably incurred in this action pursuant to the Racketeer Influenced and Corrupt Organizations Act.
- IV. Any other relief the Court deems just and proper.

JURY DEMAND

Plaintiff respectfully demands a jury trial on all issues so triable.

Dated: February 19, 2019

Respectfully Submitted,



XUEJUN MAKHSOUS, Plaintiff, *pro se*

P. O. BOX 2651, GLENVIEW, IL 60025