

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

SAWARIMEDIA LLC, DEBORAH PARKER,
JUDY KELLOGG, and PAUL ELY,

Plaintiffs,

v.

GRETCHEN WHITMER, Governor of
Michigan, JOCELYN BENSON, Secretary
of State of Michigan, and JONATHAN
BRATER, Director of the Michigan
Bureau of Elections, in their official
capacities,

Defendants.

Civil Action No.

Hon.

COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

SawariMedia LLC, Deborah Parker, Judy Kellogg, and Paul Ely (collectively "Plaintiffs"), in their capacities as the sponsor of a statewide ballot initiative, and/or in their capacities as registered voters in Michigan, files this Complaint against Defendants Gretchen Whitmer, Governor of Michigan, Jocelyn Benson, Secretary of State of Michigan, and Jonathan Brater, Director of the Michigan Bureau of Elections, in their official capacities (collectively "Defendants").

Summary of this Civil Action

1. The Plaintiffs allege that Michigan's ballot access procedure in combination with Governor Whitmer's March 24, 2020 Executive Order No. 2020-21 (the "Stay-home Order"), violates rights guaranteed to each of them by the First and Fourteenth Amendments of the United States Constitution. Plaintiffs also allege that the Defendants' refusal to unilaterally apply this Court's April 20, 2020, Order related to candidate petitions, to all ballot petitions, is a violation of the equal

protection of the law clause of the Fourteenth Amendment of the United States Constitution.

2. Plaintiff SawariMedia LLC ("SawariMedia") is a political and criminal justice reform advocacy organization that sponsored a ballot initiative petition that was filed with the Michigan Secretary of State on January 16, 2020, as required by MCL § 168.483(a).

3. Pursuant to Michigan election law, to have a ballot initiative appear on the official general ballot in November, 2020, proponents of the initiative are required to file with the Michigan Secretary of State's office by May 27, 2020, (the "Filing Deadline" or "Deadline"), three hundred forty thousand and forty-seven (340,047) signatures of qualified and registered electors residing in the state of Michigan.

4. Pursuant to Governor Whitmer's Stay-home Order, which has now been extended, and in light of a global pandemic, Michigan residents are required to stay in their homes until at least May 15, 2020. All public gatherings are prohibited. Additionally, workers who are deemed essential and permitted to leave their homes must maintain a distance of six feet from other people.

5. SawariMedia, it's staff, and hundreds of volunteers were diligently collecting signatures prior to the issuance of the Stay-home Order. Although SawariMedia has collected a substantial number of signatures from qualified and registered electors, they have not yet obtained enough signatures to meet the statutory threshold to have the initiative placed on the November 3, 2020 general ballot.

6. Plaintiffs Deborah Parker ("Parker"), Judy Kellogg ("Kellogg") and Paul Ely ("Ely"), have all contacted SawariMedia to voice their support for the initiative, and to advise SawariMedia that had the Stay-home Order not been issued, they would have each visited a location to sign the petition.

7. Through the enforcement of Michigan law in conjunction with the Stay-home Order, Defendants have effectively precluded SawariMedia and other similarly situated organizations throughout the state from qualifying to have their ballot initiatives on the November 3, 2020 general ballot.

8. The actions of the Defendants have effectively precluded an unknown number of qualified and registered Michigan electors from having their signatures counted toward a ballot initiative they wish to vote on during the November, 2020 election.

9. Defendants have indicated that the current filing deadline on May 27, 2020 will be strictly enforced, notwithstanding that this Court has recently issued an Order extending the deadline, allowing the use of electronic signatures, and reducing the number of signatures required by fifty percent, for political and judicial candidates who were collecting signatures to secure the placement of their names on the August 4, 2020 primary ballot.

10. Defendants' refusal to apply the new rules governing candidate petitions, to initiative petitions, places organizations and individuals like the Plaintiff's in the position of either having to break the law and cause other electors to break the law under threat of criminal/civil prosecution, or forgo exercising their constitutional rights altogether.

11. Plaintiffs seek prospective declaratory relief and injunctive relief as necessary to ensure their initiative's placement on the November 3, 2020 general ballot. In support of this Complaint, the Plaintiffs submit their Declaration (Exhibit A).

The Parties, Jurisdiction, and Venue

12. Plaintiff SawariMedia, is a legally formed corporation in the State of Michigan, that has formed a coalition of like-minded, qualified, registered voters. SawariMedia sponsored the ballot initiative petition that was filed with the

Michigan Secretary of State on January 16, 2020. SawariMedia was founded by Amani Sawari, who oversees and manages the initiative campaign. Amani Sawari is a registered voter in Michigan, who has consistently voted in past primary and general elections. SawariMedia resides in Detroit, Michigan.

13. Plaintiff Parker resides in Michigan and files suit in her capacity as a registered voter in Michigan. Parker is a registered voter in St. Clair Shores, Michigan, and has consistently signed ballot initiative petitions in the past, and has also consistently voted in past primary and general elections.

14. Plaintiff Kellogg resides in Michigan and files suit in her capacity as a registered voter in Michigan. Kellogg is a registered voter in Owosso, Michigan, and has consistently signed ballot initiative petitions in the past, and has also consistently voted in past primary and general elections.

15. Plaintiff Ely resides in Michigan and files suit in his capacity as a registered voter in Michigan. Ely is a registered voter in Buchanan, Michigan, and has consistently signed ballot initiative petitions in the past, and has also consistently voted in past primary and general elections.

16. Defendant Gretchen Whitmer is the Michigan Governor. Governor Whitmer has authority over the enforcement of the Michigan Election Code during a state of emergency and otherwise. The Plaintiffs assert claims against Governor Whitmer in her official capacity. Governor Whitmer's official address is P.O. Box 15282, Lansing, MI 48901.

17. Defendant Jocelyn Benson is the Michigan Secretary of State. Secretary Benson is the State's chief elections official and has ultimate authority over the enforcement of the Michigan Election Code, including the provisions challenged herein. The Plaintiffs assert their claims against Secretary Benson in her official capacity only. Secretary Benson's official address is 430 W. Allegan, Lansing, Michigan 48933.

18. Defendant Jonathan Brater is the Director of the Michigan Bureau of Elections. Director Brater accepts and reviews initiative petition filings, assists county and local election officials with their administrative duties, and administers the State's electoral process and Campaign Finance Act. The Plaintiffs assert their claims against Director Brater in his official capacity only. Director Brater's official address is Bureau of Elections, 430 W. Allegan, Lansing, Michigan 48933.

19. Venue is proper because the Plaintiffs are residents of Michigan, and because the Defendants are state officials who maintain offices throughout the State of Michigan. See *Bay County Democratic Party v. Land*, 340 F.Supp.2d 802 (E.D. Mich. 2004). This Court has personal jurisdiction over the Defendants because they are public officials of the State of Michigan and they are residents of Michigan. This Court is a proper venue for civil action under 42 U.S.C. § 1983.

20. Declaratory and injunctive relief is authorized by 28 U.S.C. §§ 2201 and 2202, and Rule 65 of the Federal Rules of Civil Procedure.

General Allegations

21. SawariMedia is a coalition of like-minded, qualified, registered voters in Michigan, who have dedicated their time, money, and other resources, to advance the coalitions ballot initiative petition.

22. On January 16, 2020, SawariMedia filed it's ballot initiative petition with the Secretary of State.

23. SawariMedia has hired a campaign staff and has been diligently campaigning since the summer of 2019. SawariMedia has created a website devoted to the ballot initiative petition, has moderated several town-hall meetings focussed on the initiative, and has hosted several training seminars for the the individuals who had volunteered to canvass the petition across the state to collect the required number

of signatures.

24. Pursuant to Michigan election law, to appear on the official general ballot, proponents of the initiative are required to file with the Michigan Secretary of State's office by May 27, 2020, at least three hundred forty thousand and forty-seven (340,047) signatures of qualified and registered electors residing in the state of Michigan. See M.C.L. 168.471.

25. SawariMedia and its campaign team implemented a plan to collect the required number of signatures early in the campaign. This plan included multiple "pop-up" and "pick-up and drop-off" locations across the state, where qualified, and registered electors could visit to sign the petition, as well as pick up copies of the petition to circulate amongst their own networks.

26. SawariMedia, its campaign team, and several hundred volunteers and supporters have been working diligently, and have already collected approximately two hundred fifteen thousand (215,000) valid signatures.

27. On or around March 15, 2020, President Trump rolled out his "15 days to slow the spread" initiative (the 'Initiative'). This Initiative, which was ultimately extended to April 30, 2020, asked people to practice social distancing and take other measures to prevent the spread of the novel SARS-CoV-2 virus ("Covid-19").

28. To comply with this Initiative and protect Michigan's citizens, SawariMedia and its campaign postponed many of its efforts to collect signatures.

29. On March 23, 2020, in response to the unprecedented Covid-19 pandemic, which has disrupted nearly every aspect of American life, Governor Whitmer issued Executive Order 2022-21 (the "Stay-home Order" or the "Order") (Exhibit B), which has now been extended until May 15, 2020.

30. Based on information and belief, the Order will likely be renewed and extended for weeks, and more importantly, beyond the May 27 Deadline

31. Whitmer's Stay-home Order is to be construed broadly. The Order makes it a civil infraction for a person to leave his or her home or residence unless that person is a worker "necessary to sustain or protect life or to conduct minimum basic operations" ("Essential Worker").

32. The Stay-home Order further requires that Essential Workers who leave their homes must maintain social distancing standards by remaining at least six feet away from others.

33. The Stay-home Order does not create an exception for ballot initiative campaign staff, and even if an exception was created, it would still be impossible for petition circulators to visit homes and public facilities to collect signatures from supporters and other electors without causing those individuals to violate the Order.

34. On or around March 24, 2020, staff from the Michigan Secretary of State informed SawariMedia that there would be no changes to the original deadline and number of signatures required for placing the initiative on the November 3, 2020 general ballot.

35. On April 15, 2020, another member of SawariMedia's staff received an email from the Bureau of Elections that stated "As of now nothing has changed. Updates will be posted on our website at www.Michigan.gov/Elections." The email came from elections@michigan.gov

36. The refusal of the Defendants to accommodate the hurdles created by the pandemic and the Stay-home Order resulted in a civil action being filed by a political candidate who faced the same challenges the Plaintiffs in this case are now facing. The Court in that case decided on behalf of the Plaintiff, and issued an Order to extend the filing deadline, to allow the use of electronic signatures, and to reduce the number of required signatures by fifty percent (50%). See 2:20-cv-10831-TGB-EAS *Esshaki v. Whitmer et al.*

37. Although the deadlines and number of signatures required are different, the signatures for ballot initiative petitions and candidate ballot petitions are collected in the same exact manner. Yet, the Defendants refuse to apply the Court's April 20, 2020 decision to initiative petitions.

38. The Defendants' enforcement of the deadline and number of signatures required is inconsistent with other actions the Secretary of State has taken in these unprecedented times. The Secretary of State offices are closed, and because the closure of the offices are linked to the Stay-home Order, they are not expected to reopen until May 15, 2020, at the earliest. Additionally, the Secretary of State has indicated that it will conduct local elections in May 2020 through mail ballots, not in person.

39. Similarly, on March 25, 2020, recognizing the severity of this pandemic, Governor Whitmer issued Executive Order 2020-22, extending the canvassing deadline of the state's primary election to April 24, 2020.

40. These extraordinary measures underscore the challenges we face as a state and nation during this pandemic. There is, under these unprecedented circumstances, absolutely no compelling or legitimate state interest to enforce the Filing Deadline and signature requirement, and to do so is unconstitutional.

41. Collecting signatures is a time-consuming process, which requires close contact with electors who reside in the state.

42. Governor Whitmer's Stay-home Order has made it impossible to collect the required number of elector signatures by May 27, 2020, the deadline imposed under M.C.L. § 168.471.

43. The enforcement of that Deadline under these unprecedented circumstances, considering the Stay-home Order, is unconstitutional because it imposes signature requirements upon the Plaintiffs, and simultaneously strips them of the ability to meet those requirements.

44. This effectively prevents the Plaintiffs, through no fault of their own, from getting their proposed ballot initiative on the ballot.

45. Over the last several months, SawariMedia and its staff has expended countless hours and other resources campaigning for the proposed ballot initiative. The enforcement of the Deadline and signature requirement severely injures SawariMedia and its supporters, and continues to impose severe burdens on them because if it is enforced, the thousands of Michigan electors who have signed the petition, and the thousands more who wish to sign the petition, will not be able to make their signatures count, and to make their voices heard in the 2020 general election.

46. Although SawariMedia has resorted to mailing copies of the petition to thousands of electors who have requested it (Exhibit D), not only is it cost prohibitive, but the US Postal Service is running several weeks behind on the processing of mail across Michigan.

47. The Plaintiffs, as well as the thousands of supporters across Michigan who support the ballot initiative, will be further injured and will suffer irreparable harm to their voting, speech, and associational rights because they will not be able to vote for an issue they wanted to make their voices heard on.

48. Defendants' refusal to apply the same rules to ballot initiative petitions that were ordered to be applied to candidate petitions, will deny voters, including the Plaintiffs, with the opportunity to vote on an issue they worked diligently to get on the ballot. The Defendant's actions will serve to subvert our constitutional democracy by arbitrarily restricting Michigan electors right to support and vote for an initiative they choose to support.

COUNT I - VIOLATION OF FIRST AND FOURTEENTH

AMENDMENT RIGHTS

(M.C.L. § 168.471 is unconstitutional as applied to SawariMedia as the sponsor of a ballot initiative)

49. The preceding Paragraphs 1 - 48 are hereby incorporated by reference.

50. Considering the existence of an unprecedented viral pandemic and Governor Whitmer's Stay-home Order, the application and enforcement of M.C.L. § 168.471 is unconstitutional as applied to SawariMedia because the enforcement of the statute would require SawariMedia to collect three hundred forty thousand and forty-seven (340,047) signatures by May 27, 2020, while simultaneously ordering SawariMedia, its staff and supporters, to not leave their homes.

51. Defendants' actions effectively prohibit SawariMedia from getting the required number of signatures, and in turn, prevent SawariMedia from having the ballot initiative placed on the November 3, 2020, general ballot, which violates SawariMedia's freedom of speech and association, equal protection, and due process rights as guaranteed by the First and Fourteenth Amendments, and as enforced by 42 U.S.C. § 1983.

52. Defendants' enforcement of the statutory requirements in conjunction with the Stay-home Order make it virtually impossible for SawariMedia to get its ballot initiative on the ballot without causing both SawariMedia's staff and the initiative's supporters to violate the Stay-home Order and face potential criminal or civil charges. Under the circumstances, these requirements are burdensome, unreasonable, and are not narrowly tailored to meet any compelling or legitimate state interest.

53. Moreover, the original requirements for political and judicial candidates seeking to secure placement on the ballot are no longer being enforced. Failure to

apply the same rules to ballot initiatives is unequal protection of the law.

54. These violations immediately injure SawariMedia and will continue to injure SawariMedia in the future in the absence of relief from this Court.

COUNT II - VIOLATION OF FIRST AND FOURTEENTH

AMENDMENT RIGHTS

(M.C.L. § 168.471 is unconstitutional as applied to all Plaintiffs as registered voters)

55. The preceding Paragraphs 1 - 54 are hereby incorporated by reference.

56. All Plaintiffs are registered voters. Each of them has consistently voted in past primary and general elections, and each of them have a constitutional right to have their signatures counted toward a ballot initiative, and to effectively cast their vote.

57. The unconstitutional exclusion of the initiative sponsored by SawariMedia through the unconstitutional enforcement of the Deadline and signature requirements deprive each of the Plaintiffs of an effective choice at the ballot on an issue they wish to vote on. It is wholly unreasonable, and fails to meet any compelling or legitimate state interest.

58. Defendants' enforcement of the Deadline and signature requirement hinder the Plaintiffs opportunity to make their voices heard at the ballot, which would otherwise exist.

59. Defendants' enforcement of the Deadline and signature requirement deprives the Plaintiffs of their constitutional right of having their signatures counted toward a ballot initiative proposal.

60. All Plaintiffs are immediately injured by these unconstitutional acts.

COUNT III - VIOLATION OF FOURTEENTH AMENDMENT RIGHT

(Refusal to apply this Court's previous Order in
Esshaki v. Whitmer, et al., to the Plaintiffs is unconstitutional)

61. The preceding paragraphs 1 - 60 are hereby incorporated by reference.

62. All Plaintiffs are United States citizens, and registered voters, who have a constitutional right to the equal protection of the law.

63. On April 20, 2020, recognizing the unprecedented circumstances we now find ourselves in, this Court ruled that the Michigan election laws were to be changed to accommodate the extraordinary situation presented by the combination of the pandemic and Stay-home Order. See 2:20-cv-10831-TGB-EAS Esshaki v Whitmer et al.

64. Although the Plaintiffs in this case face the exact same circumstances as was faced by the Plaintiffs in Esshaki v. Whitmer, et al., the Defendants refuse to apply this Court's April 20, 2020, Order, to ballot initiative petitions that were being circulated at the time these undeniable hurdles were put in place.

65. All Plaintiffs are immediately injured by the Defendants' unconstitutional acts.

Prayer for Relief

WHEREFORE, Plaintiffs respectfully requests that this Honorable Court enter a judgment in their favor and against Defendants and grant the following relief:

A. Enter declaratory judgment holding that M.C.L. § 168.471 is unconstitutional as applied to SawariMedia in its capacity as a sponsor of a ballot initiative petition, and as applied to all Plaintiffs in their capacities as qualified voters;

B. Enter a temporary restraining order and/or preliminary injunction, and permanent injunction, barring Defendants from enforcing the Deadline and/or

signature requirements;

C. Enter an order requiring the Defendants to apply the same rules to ballot initiative petitions as was previously Ordered for candidate petitions;

D. Award costs pursuant to Rule 54(d)(1) of the Federal Rules of Civil Procedure and 28 U.S.C. § 1920; and

E. Award such other relief as the Court deems just and proper.

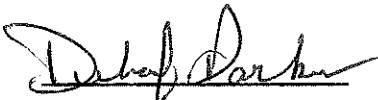
Respectfully Submitted,

SAWARIMEDIA LLC

By: 

Amani Sawari
Plaintiff, In pro per
P.O. Box 2278
Detroit, MI 48202
248-795-0886
amanisawari@gmail.com

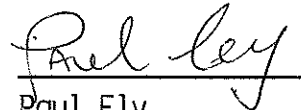
Dated: May 4, 2020



Deborah Parker
Plaintiff, In pro per
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alinosi@yahoo.com



Judy Kellogg
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Paul Ely
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269-635-1611
t1c.greenyard@yahoo.com

CERTIFICATE OF SERVICE

THE UNDERSIGNED certifies that on the 4th day of May, 2020, the foregoing paper was filed with the Clerk of the Court by placing the same in an envelope with enough pre-paid first class postage to be delivered to Clerk of the Court, United States District Court, Eastern District of Michigan, 231 W. Lafayette Blvd., Detroit, MI 48202, and by placing that envelope in a US postal service collection box in Detroit, Michigan.



Amani Sawari

EXHIBIT A

UNITED STATES DISTRICT COURT
THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

SAWARIMEDIA LLC, DEBORAH PARKER,
JUDY KELLOGG, and PAUL ELY,

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Civil Action No.

Hon.

DECLARATION OF AMANI SAWARI

1. I am the owner and manager of SawariMedia LLC.
2. SawariMedia is a coalition of like-minded individuals who work together to educate and promote their political views in the public arena.
3. On January 16, 2020, on behalf of SawariMedia, and the thousands of supporters of SawariMedia, I filed a ballot initiative petition with the Michigan Secretary of State to begin collecting signatures to qualify for the placement of the initiative on the November 3, 2020, general election ballot.
4. I hired campaign staff and have been diligently campaigning since the summer of 2019. I have purchased a website devoted to the initiative, hosted several town-hall meetings revolving around the initiative, conducted multiple training sessions across the state for the canvassers of the petition, and purchased more than thirty-four thousand (34,000) copies of the petition.

5. Pursuant to Michigan election law, to appear on the November 3, 2020, general ballot, I, as the sponsor of the initiative, am required to file with the Michigan Secretary of State's office by May 27, 2020, three-hundred forty thousand and forty-seven (340,047) qualified and registered electors who reside in the state of Michigan. M.C.L. § 168.471.
6. My campaign team and I implemented a plan to collect the number of signatures early on in the campaign.
7. My campaign team and I, along with many volunteers and supporters have been working diligently, and we have already collected approximately two-hundred fifteen thousand (215,000) valid signatures.
8. Collecting signatures is a time-consuming process, which requires close contact with electors who reside in the state.
9. On or around March 15, 2020, President Trump rolled out his "15 days to slow the spread" initiative (the "Initiative"). This Initiative, which was recently extended, asks people to practice social distancing and to take other measures to prevent the spread of the novel SARS-CoV-2 virus ("Covid-19").
10. To comply with this Initiative and to protect Michigan's citizens, my campaign team and I postponed many of our efforts to collect signatures.
11. On March 23, 2020, in response to the unprecedented Covid-19 pandemic, which has disrupted nearly every aspect of American life, Governor Whitmer issued Executive Order 2020-21 (the "Stay-home Order" or the "Order"). The Order went into effect on March 24, 2020, and was recently extended to at least May 15, 2020.
12. Based on information and belief, the Order will likely be extended beyond the May 27 deadline, but more importantly, the social distancing guidelines will likely be in effect throughout the summer, and possibly

into the winter.

13. Whitmer's Stay-home Order is to be construed broadly. The Order makes it a criminal and/or civil infraction for a person to leave their home unless that person is a worker "necessary to sustain or protect life or to conduct minimum basic operations" ("Essential Worker").
14. The Stay-home Order further requires that Essential Workers who leave their homes must maintain social distancing standards by remaining at least six feet away from others.
15. The Stay-home Order does not create an exception for the sponsor of a ballot initiative, or those who are working to collect signatures for a ballot initiative.
16. On or around March 24, 2020, staff from the Michigan Secretary of State informed a member of my staff that there would be no changes to the existing deadline and/or signature requirement.
17. On April 15, 2020, another member of my campaign staff received an email from the Bureau of Elections that stated "As of now nothing has changed. Updates will be posted on our website as www.Michigan.gov/Elections." The email came from elections@michigan.gov
18. The Defendants' enforcement of the deadline and signature requirement is inconsistent with the decision issued on April 20, 2020, by the Federal District Court, in the case of *Esshaki v. Whitmer et al.* It is also inconsistent with other actions take by the Secretary of State including the closing of their offices until the Governor's Stay-home Order expires, or is repealed. The Secretary of State has also indicated that it will conduct local elections in May 2020 through mail ballots, and not in person. Further, Governor Whitmer postponed the canvassing elections until April 24, 2020.

19. These extraordinary measures underscore the challenges we face as a state and a nation during this pandemic.
20. Governor Whitmer's Stay-home Order has made it impossible for ballot initiative sponsors like me to obtain the required number of elector signatures by May 27, 2020, the deadline imposed under M.C.L. § 168.471.
21. The enforcement of that deadline under these unprecedented circumstances, considering the Stay-home Order, is unconstitutional because it requires me to obtain signatures by May 27, 2020, and simultaneously strips me of the ability to meet those requirements.
22. This effectively prevents me, through no fault of my own, from getting our initiative on the ballot, and providing the Michigan electors with a meaningful choice related to a political topic hundreds of thousands of qualified, registered electors, have already shown their support for.
23. Over the last several months, I have expended countless hours and other resources campaigning. The enforcement of the Deadline severely injures me and, continues to impose severe burdens on me because if it is enforced, I will not be able to provide the electors of this state with a chance to vote on an issue hundreds of thousands have already shown they wish to vote on. I will also have lost a substantial amount of time and money. I have already spent a substantial amount of money mailing the petitions to electors who have requested it, but the US Postal Service is running several weeks behind on the processing of mail in Michigan.
24. The initiative's supporters and I will be further injured and will suffer irreparable harm to our voting, speech, and associational rights because our initiative will not be on the ballot, and we will not be able to make our voices heard on an issue we wish to bring about change.
25. Based on information and belief, there are several other coalitions in

Michigan that had previously filed ballot initiative petitions with the Secretary of State's office, who are now facing these same obstacles.

26. I declare under the penalty of perjury that the foregoing is true and correct.

Executed this 4th day of May 2020 by:

A handwritten signature in black ink, appearing to read 'Amani Sawari', is written over a horizontal line.

Amani Sawari

UNITED STATES DISTRICT COURT
THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

SAWARIMEDIA LLC, DEBORAH PARKER,
JUDY KELLOGG, and PAUL ELY,

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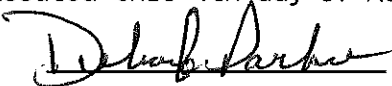
Hon.

DECLARATION OF DEBORAH PARKER

1. I am a United States citizen, and a registered voter in the state of Michigan.
2. I have routinely voted in past primary and general elections.
3. I have always been an advocate for individuals and organizations coming together to try and make positive changes in their communities.
4. In the past I have signed and supported several different ballot initiative petitions that I believed would have a positive impact on our county and/or state.
5. Sometime in March of this year (2020), I became aware of the initiative sponsored by SawariMedia LLC. After reading the entire petition on-line, I decided that I wanted to show my support for the initiative by signing the petition. At that time I located one of the locations near me that was hosting the petition for people to come in and sign it. I made plans to visit the location in the next few days.

6. Prior to me being able to visit the location to sign the petition, President Trump issued the social distancing guidelines which prevented the gatherings of large groups, and recommended that we stay six feet away from other people.
7. Just a few days after that, our Governor issued the Stay-Home Stay-Safe Order that made it legally impossible for me to leave my home to sign the petition.
8. Although I have requested that a copy of the petition be mailed to me, and have been told by SawariMedia LLC that one was mailed to me several weeks ago, I have yet to receive it in the mail.
9. I have a constitutional right to sign a petition that will bring an issue to the ballot that I want to vote on, but because of the Governor's Order, I am not allowed to do so.
10. My right to peaceably assemble for political reasons, my right to the freedom of speech, and my right to make my voice heard through a ballot initiative is being violated by the Governor of Michigan.
11. I declare under the penalty of perjury that the foregoing statements are true and correct.

Executed this 4th day of May 2020 by:


Deborah Parker

UNITED STATES DISTRICT COURT
THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

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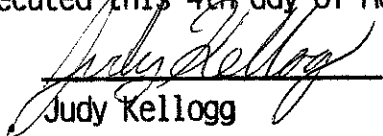
DECLARATION OF JUDY KELLOGG

1. I am a United States citizen, and a registered voter in the state of Michigan.
2. I have routinely voted in past primary and general elections.
3. I learned about a petition being circulated by SawariMedia LLC, that I was told would directly effect me and my family. I then began researching the petition on the internet.
4. After reading through the petition, I wanted the opportunity to sign the petition to show my support, and to be able to have my signature counted toward the 340,047 signatures needed to get the issue on the November ballot.
5. Using SawariMedia's website, I located a signing event that was going to be held at the University of Michigan, and made plans to attend.
6. Before the event happened, the Coronavirus began to impact our daily lives. The president ordered social distancing, and then Governor Whitmer

issued an Executive Order making it illegal for anyone to leave their homes for anything but "essential" activities.

7. That order has prevented me from signing the petition that I want to vote on in November.
8. I, by law, have the right to sign an initiative petition that I wish to see on the state's general election ballot in November, 2020. That is how we, the voters, make our voices heard.
9. I know that candidates who were collecting signatures to get on the ballot were given special accommodations due to the current circumstances. We, the registered voters of Michigan, should be given the same accommodations.
10. I believe my First and Fourteenth Amendment rights are being violated, and I am being stopped from exercising my most fundamental rights.
11. I declare under the penalty of perjury that the foregoing statements are true and correct.

Executed this 4th day of May 2020 by:


Judy Kellogg

UNITED STATES DISTRICT COURT
THE EASTERN DISTRICT OF MICHIGAN
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DECLARATION OF PAUL ELY

1. I am a United States citizen, and a registered voter in the state of Michigan.
2. I have routinely voted in past primary and general elections.
3. On or about March 15, 2020, a family member informed me of a petition that was being circulated to get an issue on the November ballot that she thought I would be interested in.
4. I posed the question on FaceBook to see if anyone else knew about it, and to try and find out where I could read the petition. I was given the website to the location of the petition by several different people on social media.
5. After reading the petition, and statistics to support it, I decided that I wanted to sign it so that I could help get it on the ballot for November, 2020.
6. Prior to me being able to sign the petition, the President of the United

States, and the Governor of Michigan, issued new rules and regulations that have now made it impossible for me to do so.

7. Those rules and regulations have now prohibited me from being able to have my signature counted toward the goal needed to get the petition on the ballot.
8. I know many other people who are in the same situation as me. These rules and regulations are going to stop us from being able to bring an issue to the ballot that we, as voters, have the right to do.
9. I believe my First and Fourteenth Amendment rights are being violated, and I am being stopped from exercising my most fundamental rights.
11. I declare under the penalty of perjury that the foregoing statements are true and correct.

Executed this 4th day of May 2020 by:

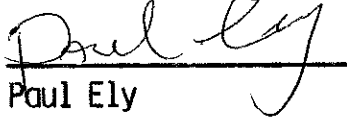

Paul Ely

EXHIBIT B

THE OFFICE OF GOVERNOR GRETCHEN WHITMER



WHITMER / NEWS / EXECUTIVE ORDERS

Executive Order 2020-21 (COVID-19)

EXECUTIVE ORDER

No. 2020-21

Temporary requirement to suspend activities that are not necessary to sustain or protect life

The novel coronavirus (COVID-19) is a respiratory disease that can result in serious illness or death. It is caused by a new strain of coronavirus not previously identified in humans and easily spread from person to person. Older adults and those with chronic health conditions are at particular risk, and there is an increased risk of rapid spread of COVID-19 among persons in close proximity to one another. There is currently no approved vaccine or antiviral treatment for this disease.

On March 10, 2020, the Michigan Department of Health and Human Services identified the first two presumptive-positive cases of COVID-19 in Michigan. On that same day, I issued Executive Order 2020-4. This order declared a state of emergency across the state of Michigan under section 1 of article 5 of the Michigan Constitution of 1963, the Emergency Management Act, 1976 PA 390, as amended, MCL 30.401-.421, and the Emergency Powers of the Governor Act of 1945, 1945 PA 302, as amended, MCL 10.31-.33.



The Emergency Management Act vests the governor with broad powers and duties to “cop[e] with dangers to this state or the people of this state presented by a disaster or emergency,” which the governor may implement through “executive orders, proclamations, and directives having the force and effect of law.” MCL 30.403(1)-(2). Similarly, the Emergency Powers of the Governor Act of 1945, provides that, after declaring a state of emergency, “the governor may promulgate reasonable orders, rules, and regulations as he or she considers necessary to protect life and property or to bring the emergency situation within the affected area under control.” MCL 10.31(1).

To suppress the spread of COVID-19, to prevent the state’s health care system from being overwhelmed, to allow time for the production of critical test kits, ventilators, and personal protective equipment, and to avoid needless deaths, it is reasonable and necessary to direct residents to remain at home or in their place of residence to the maximum extent feasible.

This order takes effect on March 24, 2020 at 12:01 am, and continues through April 13, 2020 at 11:59 pm.

Acting under the Michigan Constitution of 1963 and Michigan law, I order the following:

1. This order must be construed broadly to prohibit in-person work that is not necessary to sustain or protect life.
2. Subject to the exceptions in section 7, all individuals currently living within the State of Michigan are ordered to stay at home or at their place of residence. Subject to the same exceptions, all public and private gatherings of any number of people occurring among persons not part of a single household are prohibited.



3. All individuals who leave their home or place of residence must adhere to social distancing measures recommended by the Centers for Disease Control and Prevention, including remaining at least six feet from people from outside the individual's household to the extent feasible under the circumstances.

4. No person or entity shall operate a business or conduct operations that require workers to leave their homes or places of residence except to the extent that those workers are necessary to sustain or protect life or to conduct minimum basic operations.
 - a. For purposes of this order, workers who are necessary to sustain or protect life are defined as "critical infrastructure workers," as described in sections 8 and 9.

 - b. For purposes of this order, workers who are necessary to conduct minimum basic operations are those whose in-person presence is strictly necessary to allow the business or operation to maintain the value of inventory and equipment, care for animals, ensure security, process transactions (including payroll and employee benefits), or facilitate the ability of other workers to work remotely.

Businesses and operations must determine which of their workers are necessary to conduct minimum basic operations and inform such workers of that designation. Businesses and operations must make such designations in writing, whether by electronic message, public website, or other appropriate means. Such designations, however, may be made orally until March 31, 2020 at 11:59 pm.

5. Businesses and operations that employ critical infrastructure workers may continue in-person operations, subject to the following conditions:



- a. Consistent with sections 8 and 9, businesses and operations must determine which of their workers are critical infrastructure workers and inform such workers of that designation. Businesses and operations must make such designations in writing, whether by electronic message, public website, or other appropriate means. Such designations, however, may be made orally until March 31, 2020 at 11:59 pm. Businesses and operations need not designate:
 1. Workers in health care and public health.
 2. Workers who perform necessary government activities, as described in section 6.
 3. Workers and volunteers described in section 9(d).
- b. In-person activities that are not necessary to sustain or protect life must be suspended until normal operations resume.
- c. Businesses and operations maintaining in-person activities must adopt social distancing practices and other mitigation measures to protect workers and patrons. Those practices and measures include, but are not limited to:
 1. Restricting the number of workers present on premises to no more than is strictly necessary to perform the business's or operation's critical infrastructure functions.
 2. Promoting remote work to the fullest extent possible.



3. Keeping workers and patrons who are on premises at least six feet from one another to the maximum extent possible, including for customers who are standing in line.
 4. Increasing standards of facility cleaning and disinfection to limit worker and patron exposure to COVID-19, as well as adopting protocols to clean and disinfect in the event of a positive COVID-19 case in the workplace.
 5. Adopting policies to prevent workers from entering the premises if they display respiratory symptoms or have had contact with a person who is known or suspected to have COVID-19.
 6. Any other social distancing practices and mitigation measures recommended by the Centers for Disease Control.
6. All in-person government activities at whatever level (state, county, or local) that are not necessary to sustain or protect life, or to supporting those businesses and operations that are necessary to sustain or protect life, are suspended.
- a. For purposes of this order, necessary government activities include activities performed by critical infrastructure workers, including workers in law enforcement, public safety, and first responders.
 - b. Such activities also include, but are not limited to, public transit, trash pick-up and disposal, activities necessary to manage and oversee elections, operations necessary to enable transactions that support the work of a business's or operation's critical infrastructure workers, and the maintenance of safe and sanitary public parks so as to allow for outdoor recreation.



- c. For purposes of this order, necessary government activities include minimum basic operations, as described in section 4(b). Workers performing such activities need not be designated.

- d. Any in-person government activities must be performed consistently with the social distancing practices and other mitigation measures to protect workers and patrons described in section 5(c).

7. Exceptions.

- a. Individuals may leave their home or place of residence, and travel as necessary:
 - 1. To engage in outdoor activity, including walking, hiking, running, cycling, or any other recreational activity consistent with remaining at least six feet from people from outside the individual's household.

 - 2. To perform their jobs as critical infrastructure workers after being so designated by their employers. (Critical infrastructure workers who need not be designated under section 5(a) may leave their home for work without a designation.)

 - 3. To conduct minimum basic operations, as described in section 4(b), after being designated to perform such work by their employers.

 - 4. To perform necessary government activities, as described in section 6.

 - 5. To perform tasks that are necessary to their health and safety, or to the health and safety of their family or household members (including

pets). Individuals may, for example, leave the home or place of residence to secure medication or to seek medical or dental care that is necessary to address a medical emergency or to preserve the health and safety of a household or family member (including procedures that, in accordance with a duly implemented nonessential procedures postponement plan, have not been postponed).

6. To obtain necessary services or supplies for themselves, their family or household members, and their vehicles. *Individuals must secure such services or supplies via delivery to the maximum extent possible.* As needed, however, individuals may leave the home or place of residence to purchase groceries, take-out food, gasoline, needed medical supplies, and any other products necessary to maintain the safety, sanitation, and basic operation of their residences.
7. To care for a family member or a family member's pet in another household.
8. To care for minors, dependents, the elderly, persons with disabilities, or other vulnerable persons.
9. To visit an individual under the care of a health care facility, residential care facility, or congregate care facility, to the extent otherwise permitted.
10. To attend legal proceedings or hearings for essential or emergency purposes as ordered by a court.
11. To work or volunteer for businesses or operations (including both and religious and secular nonprofit organizations) that provide food, shelter, and other necessities of life for economically disadvantaged or

otherwise needy individuals, individuals who need assistance as a result of this emergency, and people with disabilities.

b. Individuals may also travel:

1. To return to a home or place of residence from outside this state.
 2. To leave this state for a home or residence elsewhere.
 3. To travel between two residences in this state.
 4. As required by law enforcement or a court order, including the transportation of children pursuant to a custody agreement.
8. For purposes of this order, critical infrastructure workers are those workers described by the Director of the U.S. Cybersecurity and Infrastructure Security Agency in his guidance of March 19, 2020 on the COVID-19 response (available [here](#)). Such workers include some workers in each of the following sectors:
- a. Health care and public health.
 - b. Law enforcement, public safety, and first responders.
 - c. Food and agriculture.
 - d. Energy.
 - e. Water and wastewater.



f. Transportation and logistics.

g. Public works.

h. Communications and information technology, including news media.

i. Other community-based government operations and essential functions.

j. Critical manufacturing.

k. Hazardous materials.

l. Financial services.

m. Chemical supply chains and safety.

n. Defense industrial base.

9. For purposes of this order, critical infrastructure workers also include:

a. Child care workers (including workers at disaster relief child care centers), but only to the extent necessary to serve the children or dependents of critical infrastructure workers as defined in this order. This category



includes individuals (whether licensed or not) who have arranged to care for the children or dependents of critical infrastructure workers.

b. Workers at designated suppliers and distribution centers, as described below.

1. A business or operation that employs critical infrastructure workers may designate suppliers, distribution centers, or service providers whose continued operation is necessary to enable, support, or facilitate the work of its critical infrastructure workers.
2. Such suppliers, distribution centers, or service providers may designate workers as critical infrastructure workers *only* to the extent those workers are necessary to enable, support, or facilitate the work of the original operation's or business's critical infrastructure workers.
3. Designated suppliers, distribution centers, and service providers may in turn designate additional suppliers, distribution centers, and service providers whose continued operation is necessary to enable, support, or facilitate the work of their critical infrastructure workers.
4. Such additional suppliers, distribution centers, and service providers may designate workers as critical infrastructure workers *only* to the extent that those workers are necessary to enable, support, or facilitate the work of the critical infrastructure workers at the supplier, distribution center, or service provider that has designated them.
5. Businesses, operations, suppliers, distribution centers, and service providers must make all designations in writing to the entities they are designating, whether by electronic message, public website, or other



appropriate means. Such designations may be made orally until March 31, 2020 at 11:59 pm.


6. Businesses, operations, suppliers, distribution centers, and service providers that abuse their designation authority shall be subject to sanctions to the fullest extent of the law.

- c. Workers in the insurance industry, but only to the extent that their work cannot be done by telephone or remotely.

- d. Workers and volunteers for businesses or operations (including both and religious and secular nonprofit organizations) that provide food, shelter, and other necessities of life for economically disadvantaged or otherwise needy individuals, individuals who need assistance as a result of this emergency, and people with disabilities.

- e. Workers who perform critical labor union functions, including those who administer health and welfare funds and those who monitor the well-being and safety of union members who are critical infrastructure workers, provided that any administration or monitoring should be done by telephone or remotely where possible.

10. Nothing in this order should be taken to supersede another executive order or directive that is in effect, except to the extent this order imposes more stringent limitations on in-person work, activities, and interactions. Consistent with prior guidance, a place of religious worship, when used for religious worship, is not subject to penalty under section 14.

11. Nothing in this order should be taken to interfere with or infringe on the powers of the legislative and judicial branches to perform their constitutional duties or exercise their authority. 

12. This order takes effect on March 24, 2020 at 12:01 am, and continues through April 13, 2020 at 11:59 pm.

13. The governor will evaluate the continuing need for this order prior to its expiration. In determining whether to maintain, intensify, or relax its restrictions, she will consider, among other things, (1) data on COVID-19 infections and the disease's rate of spread; (2) whether sufficient medical personnel, hospital beds, and ventilators exist to meet anticipated medical need; (3) the availability of personal protective equipment for the health-care workforce; (4) the state's capacity to test for COVID-19 cases and isolate infected people; and (5) economic conditions in the state.

14. Consistent with MCL 10.33 and MCL 30.405(3), a willful violation of this order is a misdemeanor.

Given under my hand and the Great Seal of the State of Michigan.

RELATED CONTENT

Executive Order 2020-69 (COVID-19)

Executive Order 2020-70 (COVID-19)

Executive Order 2020-65 (COVID-19)

Executive Order 2020-64 (COVID-19)

Executive Order 2020-67 (COVID-19)

Executive Order 2020-68 (COVID-19)

Executive Order 2020-66 (COVID-19)



Whitmer - Executive Order 2020-21 (COVID-19)

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Executive Order 2020-61 (COVID-19)

Executive Order 2020-62 (COVID-19)

Executive Order 2020-63 (COVID-19)

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Executive Order 2020-58 (COVID-19)

Executive Order 2020-57 (COVID-19)

Executive Order 2020-56 (COVID-19)

Executive Order 2020-55 (COVID-19)

Executive Order 2020-54 (COVID-19)

Executive Order 2020-53 (COVID-19)

Executive Order 2020-52 (COVID-19)

Executive Order 2020-51 (COVID-19)



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EXHIBIT C

SOS - When will Secretary of State offices reopen?

Page 1 of 1

OFFICIAL WEBSITE OF MICHIGAN.GOV

The Office of

Secretary of State Jocelyn Benson

SOS



When will Secretary of State offices reopen?

All Secretary of State offices will be closed through the duration of Governor Whitmer's **Stay Home, Stay Safe Executive Order**. Secretary Benson and her administration will continue to work with Governor Whitmer's administration to monitor public health across the state in order to determine when we can reopen branch offices.

Last updated: April 30, 2020

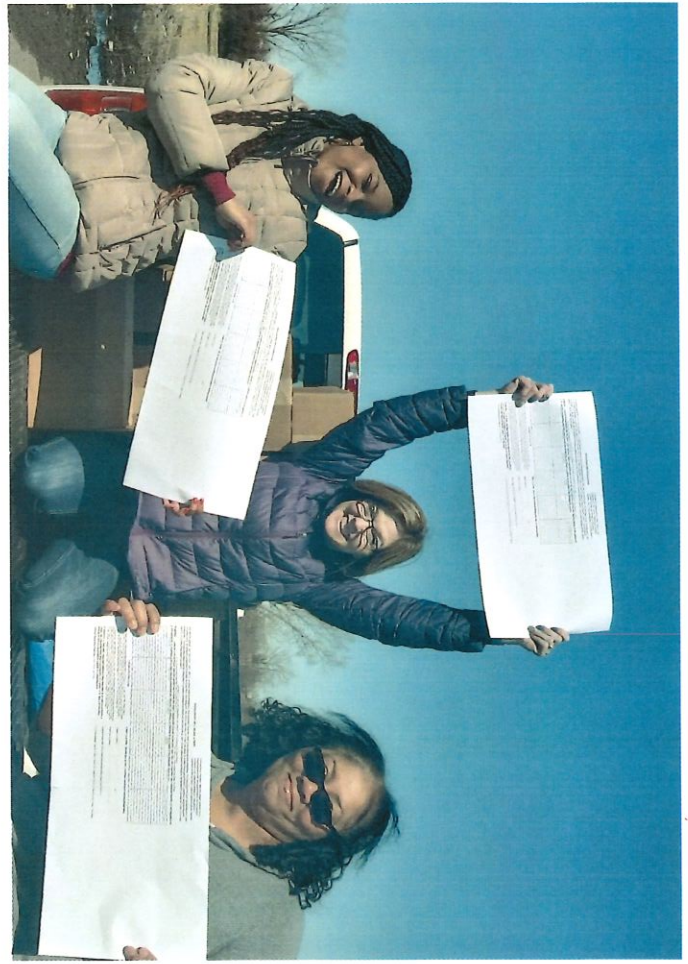


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EXHIBIT D



JS 44 (Rev. 02/19)

CIVIL COVER SHEET

County in which action arose: _____

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

SawariMedia LLC, Deborah Parker, Judy Kellogg, and Paul Ely

DEFENDANTS

Gretchen Whitmer, Joycelyn Benson, Jonathan Brater

(b) County of Residence of First Listed Plaintiff Wayne
(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant Ingham
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) Attorneys (Firm Name, Address, and Telephone Number)

AawariMedia LLC, I n Pro Per
Po B0x 2278
Detroit Michigan 48202 Phone# 248-745-0886

Attorneys (If Known)

Michigan Attorney General Office
525 W. Ottawa St
Lansing Michigan 48933

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff
 2 U.S. Government Defendant
 3 Federal Question (U.S. Government Not a Party)
 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- (For Diversity Cases Only)
- | | | | | | |
|---|---------------------------------------|---------------------------------------|---|----------------------------|----------------------------|
| | PTF | DEF | | PTF | DEF |
| Citizen of This State | <input checked="" type="checkbox"/> 1 | <input checked="" type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input checked="" type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment Accommodations <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding
 2 Removed from State Court
 3 Remanded from Appellate Court
 4 Reinstated or Reopened
 5 Transferred from Another District (specify)
 6 Multidistrict Litigation - Transfer
 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity).
28 U.S.C. 1331

Brief description of cause:
Federal Question: other Civil Rights

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ 0.00
CHECK YES only if demanded in complaint
JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE _____

DOCKET NUMBER _____

DATE
May 4, 2020

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG JUDGE _____

PURSUANT TO LOCAL RULE 83.11

1. Is this a case that has been previously dismissed?

- Yes
- No

If yes, give the following information:

Court: _____

Case No.: _____

Judge: _____

2. Other than stated above, are there any pending or previously discontinued or dismissed companion cases in this or any other court, including state court? (Companion cases are matters in which it appears substantially similar evidence will be offered or the same or related parties are present and the cases arise out of the same transaction or occurrence.)

- Yes
- No

If yes, give the following information:

Court: _____

Case No.: _____

Judge: _____

Notes :
