

ROBERT PATRICK STICHT (SBN 138586)
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JUDICIAL WATCH, INC.

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**Application for admission pro hac vice
forthcoming*

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

JERRY GRIFFIN, MICHELLE
BOLOTIN, MICHAEL
SIENKIEWICZ, AND JAMES B.
OERDING,

Plaintiffs,

v.

ALEX PADILLA, in his official
capacity as Secretary of State of
California,

Defendant.

Case No. _____

COMPLAINT
FOR DECLARATORY AND
INJUNCTIVE RELIEF

Plaintiffs Jerry Griffin, Michelle Bolotin, Michael Sienkiewicz, and James B. Oerding, by and through the undersigned counsel, file this Complaint for Declaratory and Injunctive Relief against Defendant Alex Padilla, in his official capacity as the California Secretary of State, and allege as follows:

1. Plaintiffs are four California registered voters who seek declaratory and injunctive relief to enjoin California’s Presidential Tax Transparency and Accountability Act, S. Bill 27, 2019-2020 Reg. Sess. (Ca. 2019) (hereafter “SB 27”). This law requires all candidates who wish to participate in a California presidential primary to publicly disclose their tax returns for the past five years. Candidates who do not comply are barred from having their names printed on California’s primary ballots. Plaintiffs allege that SB 27 imposes candidate qualifications beyond those allowed by the U.S. Constitution and impermissibly burdens their federal constitutional and statutory rights.

JURISDICTION AND VENUE

2. This Court has original jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§ 1331 and 1343 because the matters in controversy arise under the Constitution and laws of the United States.

3. Venue is proper in this district pursuant to 28 U.S.C. § 1391(b) because a Defendant resides in this district and because a substantial part of the events and omissions giving rise to the claims herein occurred in this district.

4. This Court has the authority to enter a declaratory judgment and to provide injunctive relief pursuant to Rules 57 and 65 of the Federal Rules of Civil Procedure and 28 U.S.C. §§ 2201 and 2202.

PARTIES

5. Plaintiff Jerry Griffin is a resident and a registered voter of Los Angeles County, California, who has voted and intends to vote in the County. He is a registered Republican who intends to vote in the 2020 primary and general elections for a party-affiliated candidate.

6. Plaintiff Michelle Bolotin is a resident and a registered voter of Los Angeles County, California who has voted and intends to vote in the County. She is a registered Independent who intends to vote in the 2020 general elections for a party-affiliated candidate.

7. Plaintiff Michael Sienkiewicz is a resident and a registered voter of San Francisco County, California who has voted and intends to vote in the County. He is a registered Republican who intends to vote in the 2020 primary and general elections for a party-affiliated candidate.

8. Plaintiff James B. Oerding is a resident and a registered voter of Yolo County, California who has voted and intends to vote in the County. He is a registered Democrat who intends to vote in the 2020 primary and general elections for a party-affiliated candidate.

9. Defendant Alex Padilla is the California Secretary of State and has served in this capacity since January 5, 2015. He is sued in his official capacity only.

FACTS

10. Plaintiffs bring this action under 42 U.S.C. § 1983 to remedy deprivations of rights, privileges, or immunities secured by the Constitution and laws of the United States.

11. On July 30, 2019, California Governor Gavin Newsom signed SB 27 into law.

12. SB 27 revised California’s Election Code to include several provisions imposing new requirements on party candidates wishing to participate in California’s presidential preference primary. CAL. ELECTIONS CODE §§ 6880-84 (Deering 2019).

13. SB 27 requires that all candidates seeking to participate in California’s presidential primary produce to the California Secretary of State “every income tax return the candidate filed with the Internal Revenue Service in the five most recent taxable years.” *Id.*, § 6883.

14. These tax returns must be produced 98 days before the presidential primary.

15. SB 27 directs the California Secretary of State to publish each candidate's tax returns within five days of receiving them by posting them on the Secretary's website.

16. The Secretary of State is responsible for enforcing this requirement.

Specifically, SB 27 provides that “[n]otwithstanding any other law, the Secretary of State shall not print the name of a candidate for President of the United States on a primary election ballot, unless the candidate” timely discloses his or her tax returns. *Id.*, § 6883.

17. The United States Constitution sets forth the exclusive qualifications for president:

No Person except a natural born Citizen, or a Citizen of the United States, at the time of the Adoption of this Constitution, shall be eligible to the Office of President; neither shall any Person be eligible to that Office who shall not have attained to the Age of thirty five Years, and been fourteen Years a Resident within the United States.

U.S. CONST. art. II, § 1, cl. 5 (“Qualifications Clause”).

18. The Constitution divests states of any power to add qualifications to those set forth in the Qualifications Clause.

19. California does not possess the power to supplement the exclusive qualifications set forth in the Qualifications Clause.

20. SB 27 purports to impose additional qualifications in primary elections to those set forth in the Qualifications Clause, including that the candidate disclose to the Secretary of State, for public dissemination, that candidate’s tax returns.

21. The new, substantive qualifications set forth in SB 27 only apply to party-affiliated candidates and not to non-party-affiliated presidential candidates who do not run in primaries.

22. SB 27 creates an absolute bar to party candidates who would otherwise qualify under the Qualifications Clause.

23. No existing state or federal law mandates that presidential candidates disclose their tax returns to participate in presidential primaries.

24. California’s legislature determined that SB 27 is an “urgency statute necessary for the immediate preservation of the public peace, health, or safety” which

1 “shall go into immediate effect,” and that the “facts constituting the necessity are” the
2 need to “ensure that the protections afforded by this act are in place for the 2020 primary
3 election.” SB 27, § 3.

4 25. California statewide presidential primary is March 3, 2020.

5 26. Applying the 98-day deadline set forth in SB 27 for disclosure, all candidate
6 tax returns must be provided to the Secretary of State by Tuesday, November 26, 2019.

7 27. The United States has held 58 presidential elections and related primaries
8 over the last 231 years. During that time, no state or federal law has ever mandated that
9 presidential candidates disclose their tax returns to qualify or appear on a ballot.

10 28. The United States ratified the Sixteenth Amendment authorizing the federal
11 income tax in 1913. Form 1040 entitled “U.S. Individual Income Tax Return” was
12 created that same year.

13 29. Since 1913, voters have cast their ballots in 26 presidential elections in
14 which no state or federal laws required presidential candidates to disclose their tax
15 returns.

16 30. The voluntary release of presidential candidates’ tax returns is a recent, and
17 partial, phenomenon, notwithstanding a current media narrative suggesting otherwise.

18 31. President Richard Nixon disclosed his tax returns only after he was elected
19 to his second term. That disclosure only occurred, moreover, after an IRS employee in
20 West Virginia illegally leaked excerpts of his returns to The Providence Journal-Bulletin,
21 which later published them without authorization. This prompted President Nixon to
22 eventually release his complete tax return and submit to a voluntary audit.

23 32. In 1976, President Gerald Ford released only a summary of his tax returns.

24 33. One study found that 7 of 34 “major” candidates for president since 1976, or
25 about 20%, refused to produce their tax returns.

26 34. In 1992, California Governor Jerry Brown, who was then Bill Clinton’s
27 closest rival, did not release his tax returns.

35. In 2000, third-party candidate Ralph Nader did not disclose his tax returns.

36. During the 2017-2018 legislative session, California's legislature passed Senate Bill 149, which was nearly identical to SB 27.

37. Reviewing SB 149, California's Legislative Counsel "concluded that it would be unconstitutional if enacted."

38. Governor Jerry Brown vetoed SB 149. In doing so, he noted:

First, it may not be constitutional. Second, it sets a "slippery slope" precedent. Today we require tax returns, but what would be next? Five years of health records? A certified birth certificate? High school report cards? And will these requirements vary depending on which political party is in power? A qualified candidate's ability to appear on the ballot is fundamental to our democratic system. For that reason, I hesitate to start down a road that well might lead to an ever escalating set of differing state requirements for presidential candidates.

39. During the 2016 election campaign, the issue of tax returns gained renewed prominence after then-candidate Donald Trump declined to produce his returns.

40. Spokespersons for President Trump have repeatedly confirmed that he will not disclose his tax returns prior to the 2020 presidential election.

41. Four candidates for the 2020 Democratic nomination for president have not disclosed their tax returns. Those candidates are former Vice-President Joe Biden, former-Secretary of Housing and Urban Affairs Julian Castro, Congresswoman Tulsi Gabbard, and Andrew Yang.

42. Section 1 of SB 27 (§ 6681) declares California's purported interests in requiring the disclosure of candidates' personal tax returns.

43. The California legislature declared that the State's interests in requiring disclosure of personal tax returns are: "ensuring that its voters make informed, educated choices in the voting booth," supplying "voters with" what is described as "essential

1 information” about a candidate’s “potential conflicts of interest, business dealings,
2 financial status, and charitable donations,” allowing voters to “better estimate the risks of
3 any given Presidential candidate engaging in corruption,” and ensuring that “any
4 violations of the Foreign Emoluments Clause . . . or statutory prohibitions on behavior
5 such as insider trading are detected and punished.” CAL. ELEC. CODE § 6681.

6 44. None of the interests proffered by the California legislature for requiring the
7 disclosure of candidates’ tax returns is related to election procedure or administration.
8 Rather, the stated interests incorporate particular, substantive judgments about what is
9 most important for voters to know when considering a candidate, how voters should go
10 about “estimate[ing] the risk” of a candidate “engaging in corruption,” and what might
11 assist law enforcement in detecting violations of the Emoluments Clause and crimes
12 “such as insider trading.”

13 45. SB 27 is not procedural nor administrative. It imposes a new, substantive
14 qualification on presidential candidates that renders them ineligible for a position on the
15 primary ballot if they choose not to release their tax returns.

16 46. Unless SB 27 is enjoined, states will assume the power to create their own
17 qualifications for national candidates seeking to obtain a party’s nomination for president.
18 This could lead to as many as 50 distinct and possibly inconsistent sets of qualifications
19 regarding the only national election in the United States. Using rationales similar to
20 California’s, states might come to demand medical records, mental health records, sealed
21 juvenile records, driving records, results of intelligence, aptitude, or personality tests,
22 college applications, Amazon purchases, Google search histories, browsing histories, or
23 Facebook friends.

24 47. Under SB 27, California voters can only cast their ballots in presidential
25 primaries for party candidates willing to waive their privacy rights regarding their
26 personal tax returns.

27 48. SB 27 will have the effect of limiting the number of presidential candidates
28

1 that party voters have the opportunity to vote for in the primaries.

2 49. The harm inflicted on party voters by SB 27 will be greatly magnified by the
3 fact that California's congressional primaries take place at the same time. Whenever a
4 popular, party-affiliated candidate is kept off the ballot by SB 27, that party's turnout
5 naturally will suffer. As a result, the rest of that party's down-ballot candidates will be
6 less likely to prevail under California's nonpartisan blanket primary system, which allows
7 only the top two vote-getters, regardless of party, to proceed to the general election.

8 50. Unless SB 27 is enjoined, California, through its Secretary of State, will
9 prevent Plaintiffs and voters like them from having the opportunity to cast their votes on
10 March 3, 2020 in support of party candidates who are otherwise qualified to be president
11 of the United States.

12 51. Immediate relief is needed to ensure that the national nomination of party
13 candidates is not disrupted by California's new presidential qualification.

14 **First Claim for Relief**

15 *(Violation of the Qualifications Clause and 42 U.S.C. § 1983)*

16 52. Plaintiffs reallege all preceding paragraphs as if fully set forth herein.

17 53. SB 27 purports to add candidate qualifications to those contained in the
18 Qualifications Clause.

19 54. The State of California does not have the lawful authority to impose, nor
20 does its Secretary of State have the lawful authority to enforce, candidate qualifications
21 beyond those contained in the Qualifications Clause.

22 55. SB 27 has the effect of handicapping a class of candidates who choose not to
23 supply their tax returns.

24 56. SB 27 has the sole purpose of indirectly adding additional qualifications to
25 those set forth in the Qualifications Clause.

26 57. Defendant Padilla has acted and, unless enjoined, will act under color of
27 state law to deprive Plaintiffs of their voting rights by violating the Qualifications Clause.
28

58. Plaintiffs have no adequate remedy at law and will suffer serious and irreparable harm to their constitutional rights unless Defendant Padilla is enjoined from implementing and enforcing SB 27 with respect to party-affiliated presidential candidates.

Second Claim for Relief

(Violation of the First Amendment and 42 U.S.C. § 1983)

59. Plaintiffs reallege all preceding paragraphs as if fully set forth herein.

60. Plaintiffs have a First Amendment right to express their political preferences by voting for any qualified presidential candidate.

61. SB 27 limits candidates who may run in California’s party primaries on the basis of whether they have released their tax returns.

62. There is no legally sufficient justification for demanding that candidates release their tax returns in order to appear on a primary ballot.

63. Plaintiffs have a First Amendment right to associate with candidates who choose to preserve their privacy by declining to release their tax returns, and to associate with voters who prefer such candidates.

64. SB 27 bars candidates who choose not to release their tax returns from running in party primaries.

65. There is no legally sufficient justification for barring candidates who choose not to release their tax returns from running in party primaries.

66. Plaintiffs have a First Amendment right to associate with other voters to nominate the presidential candidates they prefer.

67. SB 27 interferes with how Plaintiffs and the voters they choose to associate with nominate the presidential candidates they prefer.

68. There is no legally sufficient justification for interfering with how Plaintiffs and the voters they associate with nominate the presidential candidates they prefer.

69. By barring candidates from running in California's party primaries on the basis of whether they release their tax returns, SB 27 inflicts a severe burden on California voters that is not justified by an overriding governmental interest.

70. SB 27 violates Plaintiffs' First Amendment rights.

71. Defendant Padilla has acted and, unless enjoined, will act under color of state law to deprive Plaintiffs of their rights under the First Amendment.

72. Plaintiffs have no adequate remedy at law and will suffer serious and irreparable harm to their constitutional rights unless Defendant Padilla is enjoined from implementing and enforcing SB 27 with respect to party-affiliated presidential candidates.

Third Claim for Relief

*(Violation of the Equal Protection Clause of the
Fourteenth Amendment and 42 U.S.C. § 1983)*

73. Plaintiffs reallege all preceding paragraphs as if fully set forth herein.

74. SB 27 creates two categories of voters, those who support party-affiliated candidates, and those who support non-party-affiliated candidates.

75. Party-affiliated candidates are required to produce tax returns in order to appear on the ballot.

76. Non-party-affiliated candidates do not compete in primaries and are not required to produce their tax returns to appear on the ballot.

77. There is no legally sufficient justification for treating voters who support party-affiliated candidates differently from voters who support non-party-affiliated candidates.

78. SB 27 creates two categories of voters, those who support party-affiliated candidates who do not release their tax returns, and those who support party-affiliated candidates who do release their tax returns.

79. Party-affiliated candidates who have chosen to preserve their privacy

1 respecting their tax return information by refusing to disclose their tax returns are barred
2 from appearing on the primary ballot.

3 80. Party-affiliated candidates who do release their tax returns are not prohibited
4 from appearing on the primary ballot.

5 81. There is no legally sufficient justification for treating voters who support
6 party-affiliated candidates who do not release their tax returns differently from voters
7 who support non-party-affiliated candidates who do release their tax returns.

8 82. SB 27 violates Plaintiffs' rights under the Fourteenth Amendment to the
9 equal protection of the laws.

10 83. Defendant Padilla has acted and, unless enjoined, will act under color of
11 state law to deprive Plaintiffs of their rights under the Fourteenth Amendment.

12 84. Plaintiffs have no adequate remedy at law and will suffer serious and
13 irreparable harm to their constitutional rights unless Defendant Padilla is enjoined from
14 implementing and enforcing SB 27.

15 **PRAYER FOR RELIEF**

16 WHEREFORE, Plaintiffs asks this Court to enter a judgement in their favor and
17 provide the following relief:

- 18 a. A declaratory judgment declaring that SB 27 violates the Qualification
19 Clause, Article III, §1 cl. 5;
- 20 b. A declaratory judgment declaring that SB 27 violates Plaintiffs' First
21 Amendment rights;
- 22 c. A declaratory judgment declaring that SB 27 violates Plaintiffs' rights under
23 the Equal Protection Clause of the Fourteenth Amendment;
- 24 d. A permanent injunction prohibiting the Secretary of State of California from
25 implementing, administering, and enforcing the provisions of SB 27;
- 26 e. An order that Defendants pay Plaintiffs' reasonable attorney's fees,
27 including litigation expenses and costs; and
28

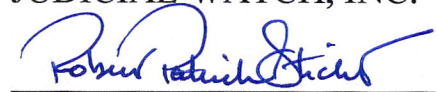
g. Such other and further relief as this Court deems just and proper.

August 1, 2019

Respectfully submitted,

JUDICIAL WATCH, INC.

By:



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**Application for admission pro hac vice
forthcoming*

Attorneys for Plaintiffs

CIVIL COVER SHEET

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

Jerry Griffin, Michelle Bolotin, Michael Sienkiewicz, and
James B. Oerding

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

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

Robert Patrick Sticht / Judicial Watch, Inc.

425 Third St SW, Suite 800, Washington DC 20024

Tel: (202) 646-5172

DEFENDANTS

Alex Padilla, in his official capacity as Secretary of State of
California

County of Residence of First Listed Defendant _____

(IN U.S. PLAINTIFF CASES ONLY)

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

Attorneys (If Known)

Xavier Becerra

Attorney General's Office

California Department of Justice

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

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question
(U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 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)

- | | PTF | DEF | | PTF | DEF |
|-----------------------------------------|----------------------------|----------------------------|---------------------------------------------------------------|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input 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 LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<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)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<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 checked="" 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):
42 USC 1983

Brief description of cause:

SB 27 violates US Const. Qualifications Clause, First Amendment, and Fourteenth Amendment equal protection

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

August 1, 2019

SIGNATURE OF ATTORNEY OF RECORD

Robert Patrick Sticht

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE