

IN THE CIRCUIT COURT, FOURTH
JUDICIAL CIRCUIT, IN AND FOR
DUVAL COUNTY, FLORIDA

CASE NO.:

DIVISION:

STATE OF FLORIDA, ex rel. DEXTER V.
DAVIS and THOMAS A. DELEGAL, III, Attorneys,
and CURITS L. BOOKER, SR., ALBERT L.
BUCKNER, III, JACK MEEKS, DANA MILLER
and ROBIN WALLACE, in relation to the State
of Florida and Individually,

Plaintiffs,

vs.

THE CITY OF JACKSONVILLE, a body politic,
THE REPUBLICAN NATIONAL COMMITTEE,
DONALD J. TRUMP FOR PRESIDENT, INC.,
a nonstock Virginia corporation, and ASM
GLOBAL PARENT, INC., a Delaware corporation,

Defendants.

COMPLAINT

Plaintiffs STATE OF FLORIDA, ex rel. DEXTER V. DAVIS and THOMAS A. DELEGAL, III, Attorneys, and CURITS L. BOOKER, SR., ALBERT L. BUCKNER, III, JACK MEEKS, DANA MILLER and ROBIN WALLACE, in relation to the State of Florida and Individually, sue Defendants THE CITY OF JACKSONVILLE, a body politic, THE REPUBLICAN NATIONAL COMMITTEE, DONALD J. TRUMP FOR PRESIDENT, INC., a nonstock Virginia corporation, and ASM GLOBAL PARENT, INC., a Delaware corporation, and allege:

The Nature of the Action

1. In behalf of the State of Florida and Individually, Plaintiffs bring this action for Declaratory Judgment and equitable relief pursuant to Chapters 86 and 60, Florida Statutes, and the common law of the State of Florida, declaring that the congregation of thousands of people from all over the United States in and around VyStar Veterans Memorial Arena, Jacksonville, Florida under the circumstances and practices encouraged and required by the Republican National Committee (RNC) and it's leadership to be a nuisance injurious to the health, welfare and property rights of Plaintiffs, in particular, and the health and welfare of the community of Jacksonville, Florida, and enjoining the use of such facility, its properties and the public areas of the City of Jacksonville from being used and operated by Defendant RNC as a nuisance and in a manner deleterious to Plaintiffs and the community of Jacksonville, Florida.

The Pandemic

2. Since March 2020, the COVID-19 pandemic in the United States has infected over 2,500,000 people and killed over 125,000. As of July 4, 2020, Duval County had recorded 8,614 cases and 68 deaths according to the Florida DOH dashboard. [<https://fdoh.maps.arcgis.com/apps/opsdashboard/index.html#/8d0de33f260d444c852a615dc7837c86/>].

3. "COVID-19 spreads mainly among people who are in close contact (within about 6 feet) for a prolonged period. Spread happens when an infected person coughs, sneezes, or talks, and droplets from their mouth or nose are launched into the air and land in the mouths or noses of people nearby. The droplets can also be inhaled into the lungs. Recent studies indicate that people who are infected but do not have symptoms

likely play a role in the spread of COVID-19.” [<https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/social-distancing.html>]

4. Jacksonville authorities initially supported and required strict practices to reduce the spread of the virus in Jacksonville by encouraging staying at home, wearing a mask in public, social distancing and avoiding gatherings of more than a few people. As a consequence, the spread of the pandemic was greatly curtailed in Jacksonville and it had one of the lower infection and morbidity rates in the State of Florida. In May and early June 2020, the State and the City of Jacksonville withdrew most limitations on public gatherings and social interaction and national, state and local leaders encouraged getting back to “normal” activities.

5. As a consequence of loosening COVID-19 health-safety practices, the City of Jacksonville and the State of Florida began experiencing an unprecedented number of infections. During the week of June 5, 2020, when bars were allowed to reopen, Jacksonville’s positive test rate was only 1.6% with 156 new cases that week. By the end of June, the test positive rate was 14%; the number of new cases reported in one day was over four times the weekly rate three week before; and Jacksonville had one of the highest rates of spread of COVID-19 in the nation. There is a direct correlation between the spread of COVID-19 and increased illness and death and the failure to follow COVID-19 health safety practices of avoiding indoor groups or congested areas, maintaining social distancing of at least 6 feet and wearing a mask.

6. Epidemiologists have coined what they call the “Three Cs” of transmission: closed spaces with poor ventilation, crowded settings and close contact with others. In order to avoid community spread of COVID-19, public health experts are unanimous that

the public must avoid congregating and maintain social distancing of six (6) feet and wear a mask. [<https://floridahealthcovid19.gov/prevention/>]

7. To avoid community spread of COVID-19 and to protect the health and welfare of Plaintiffs and the community, it is necessary and essential that all super spreader events where large numbers of people congregate in close proximity indoors not occur.

8. Defendants have entered into an agreement to conduct the Republican National Convention at the VyStar Veterans Memorial Arena in Jacksonville, Florida from August 24-27, 2020. As described more fully hereinafter, such event involves “packing” the 15,000 person-capacity arena with 12,000-15,000 people from virtually every state of the United States. Unless restricted by the Court, the congregation of thousands of people in close proximity for extended periods of time will constitute a nuisance and result in massive spread of COVID-19 among the persons in attendance and throughout the City of Jacksonville and Northeast Florida and interfere in Plaintiffs’ use and enjoyment of their property and right to be free of infliction of disease and death.

Jurisdiction and Venue

9. This Circuit Court has equity jurisdiction with the power and authority to enjoin private and public nuisances. Section 26.012(3), Florida Statutes.

10. Venue is proper because the nuisance complained of is located in Jacksonville, Duval County, Florida, and Defendants are doing business in Jacksonville, Florida.

Plaintiffs and the Arena Neighborhood

11. Plaintiffs are residents and/or owners or operators of businesses in the neighborhood around VyStar Veterans Memorial Arena, and are within the Convention zone, and will be directly and adversely impacted by the nuisance.

12. The community in which the Arena is located is predominantly African American and home to many older individuals who are especially vulnerable to COVID-19. Data from the CDC shows that African American residents are three (3) times more likely to be infected and nearly twice as likely to die from COVID-19. This area also encompasses Jacksonville's largest homeless residential center where many homeless people come each day for food and assistance. Exposure of this community to the comings and goings of the thousands of people who will be involved with the Convention is especially harmful to their health and welfare because of their vulnerability to COVID-19.

13. Plaintiff Dexter V. Davis is citizen of Jacksonville, Duval County, Florida and is an attorney with offices in the Convention zone and near VyStar Memorial Veterans Arena. He has several close family members who have suffered COVID-19, one of which has died, and he is acutely aware of the danger of exposure to COVID-19 and the impact the nuisance will have on his business and on his community.

14. Plaintiff Thomas A. "Tad" Delegal is a citizen of Jacksonville, Duval County, Florida and is an attorney who carries out his legal business in offices in the Convention zone and near VyStar Memorial Veterans Arena. He has several close family members who have suffered COVID-19 and he is acutely aware of the danger of exposure to COVID-19 and the impact the nuisance will have on his business and on his community.

15. Plaintiff Curtis L. Booker, Sr. is a citizen of Jacksonville, Duval County, Florida and Pastor of God's Way of Living International Church which is located in the Convention zone and near VyStar Arena. Many of the visitors to his church are elderly and because of exposure to COVID-19 caused by Convention attendees who may come in contact with his parishioners, he will not be able to carry out his ministry during the time leading up to, including and after the Republic National Convention when a large number of out of town visitors will be in the neighborhood.

16. Plaintiff Albert L. Buckner, III is a citizen of Jacksonville, Duval County, Florida and is employed by Duval County Public Schools and lives near VyStar Arena. He and his wife have medical conditions that make them especially vulnerable to COVID-19 and his wife provides care for an extremely high risk person and she must assure she is not exposed to COVID-19 by Convention attendees.

17. Plaintiff Jack Meeks is a citizen of Duval County, Florida and a Certified Public Accountant and Historic Property Developer who owns multiple properties in proximity of VyStar Arena and within the Convention zone and is a resident of Springfield, Jacksonville, Florida. He is acutely aware of the danger of exposure to COVID-19 and the impact the nuisance will have on his business and on his community.

18. Plaintiff Dana Miller is a citizen of Jacksonville, Duval County, Florida and is the operator of Man Cave Barber Shop which is located near VyStar Arena. Mr. Miller's barber shop is high on the internet list for barber shops in the Convention zone and ordinarily would expect persons attending the Republic National Convention to utilize his shop. However, because attendees to the Convention, and in particular the VyStar Arena, pose a high risk of exposure to COVID-19, Mr. Miller will be required to close his

shop and thereby lose revenues in order to protect himself and his local patrons from exposure to COVID-19.

19. Plaintiff Robin Wallace is a citizen of Jacksonville, Duval County, Florida and owns and operates Hair Architects, Grooming and Styling, a beauty salon/barber shop on A. Phillip Randolph Boulevard near VyStar Arena and in the Convention zone. She will not be able to carry on her normal business because of the exposure to COVID-19 caused by attendees at the Republic National Convention.

20. Because of their business and property interests near the convention center and within the convention zone, and the masses of people coming and going in that area, many of which are from out of state, Plaintiffs' ability to use and enjoy their property and to carry on their respective activities and businesses will be substantially impaired by the Convention COVID-19 nuisance.

Standing

21. In 1917, the Florida legislature enacted Chapter 7367, Laws of Florida (1917), giving all citizens the right to bring a direct action to abate and enjoin a nuisance injurious to the health of the citizens in general:

Whoever shall erect, establish, continue, or maintain, own or lease any building, booth, tent or place which tends to annoy the community *or injure the health of the community* * * * shall be deemed guilty of a nuisance, and the building, erection, place, tent or booth * * * are also declared a nuisance, and all such persons, places, shall be abated and enjoined as hereinafter provided.

Whenever any nuisance as defined in this act is kept, maintained or exists the state's attorney, county solicitor, county prosecutor, *or any citizen of the county* through any attorney he may select, *may maintain his action* by bill in chancery in the proper court in the name of the state of Florida upon the relation of such attorneys or citizen *to enjoin said nuisance,*

the person, or persons conducting or maintaining the same and the owner or agent of the building or ground upon which said nuisance exists.

The referenced Section 3680 of the General Statutes of Florida (1906) provided:

*All nuisances which tend to annoy the community or injure the health of the citizens in general, or to corrupt the public morals, shall be indictable and punishable, * * *.*

This 1917 enactment is presently codified in Sections 60.05(1), 823.01, and 823.05(1), Florida Statutes (2020).

22. A private citizen of the county affected may institute a suit in equity in the name of the State to suppress a public nuisance, without prior application to the state's attorney to bring the suit, and without the necessity for the citizen relator to show they will sustain special damages or injury different in kind from injury to the public at large. See, *Pompano Horse Club, Inc. v. State ex rel. Bryan*, 93 Fla. 415, 111 So. 801 (1927); *Little River Theatre Corporation v. State, ex rel. Hodge*, 135 Fla. 854, 185 So. 855 (1939); *State ex rel. Gardner v. Sailboat Key, Inc.*, 295 So.2d 658 (Fla. 3d DCA 1974).

23. An unlawful use is not essential to the existence of an actionable public nuisance. A given activity can constitute a judicially abatable nuisance notwithstanding compliance with statutes, regulations, ordinances or administrative rules. See, *Saadeh v. Stanton Rowing Foundation, Inc.*, 912 So.2d 28 (Fla. 1st DCA 2005); *Lake Hamilton Lakeshore Owners Association, Inc. v. Neidlinger*, 182 So.3d738 (Fla. 2d DCA 2015); *State ex rel. Gardner v. Sailboat Key, Inc.*, 295 So.2d 658 (Fla. 3d DCA 1974) (on rehearing); *State ex rel. Shevin v. Tampa Electric Company*, 291 So.2d 45 (Fla. 2d DCA 1974); *Barfield Instrument Corporation v. Sea View Industries, Inc.*, 102 So.2d 740 (Fla. 3d DCA 1958); *Cason v. Florida Power Co.*, 74 Fla. 1, 76 So. 535 (1917).

The Defendants

24. The Defendant City of Jacksonville is the consolidated local government of Duval County, Florida, organized and existing under the Constitution and laws of the State of Florida, and is the owner of VyStar Veterans Memorial Arena, and has responsibility for the safety and welfare of the citizens of Jacksonville.

25. The Defendant Republican National Committee (hereinafter "RNC") is a national committee as defined by 52 U.S.C. §30101. It manages the Republican Party's business at the national level and is responsible for and has been carrying on the business of planning, managing and operating the Republican National Convention in Jacksonville, Florida.

26. The Defendant Donald J. Trump for President, Inc. (hereinafter "the Trump Campaign") is a nonstock Virginia corporation with its principal place of business in the State of New York and has been actively engaged in planning and facilitating the operation of the Republican National Convention and is doing business in Jacksonville, Florida.

27. Defendant ASM Global Parent, Inc. (hereinafter "ASM Global") is a Delaware corporation and is the successor-by-merger or is otherwise the successor in interest to exclusive contractual rights with regard to the management and operation of the Arena. ASM Global, whether directly or through its local Jacksonville office, its brokers or its local, national and regional agents, leases the Arena to promoters of events such as the Republican National Convention and is, pursuant to Florida Statutes §48.181(3), conclusively presumed to be both engaged in substantial and not isolated

activities within this State and operating, conducting, engaging in, or carrying on a business or business venture in this State.

28. Defendants RNC, The Trump Campaign, and ASM Global have accepted, and are accepting, the privilege to operate, conduct, engage in, and carry on their business ventures in the State of Florida, and have offices or agencies within the State of Florida. Such conduct constitutes the appointment of the Secretary of State of Florida as their agent upon whom all process, including service of process, in this action, may be served, pursuant to Florida Statutes § 481.181(1).

29. Defendants RNC, The Trump Campaign, and ASM Global, directly and through their agents, are operating, conducting, engaging in, or carrying on a business or business venture within this State, or have offices or agencies within this State, and have thereby submitted themselves to the jurisdiction of the courts of the State of Florida pursuant to Florida Statutes § 48.193.

The Republican National Convention

30. The standard practice and example of the leadership of Defendant RNC and the nominees of the Republican Party for President and Vice President of the United States is to eschew safe COVID-19 health practices. President Trump has repeatedly refused to wear a mask in public, even in places and jurisdictions that require doing so. Vice President Pence, who ostensibly has been responsible for overseeing the Administration's response to the COVID-19 crisis, has hosted internet photographs of himself meeting with campaign workers, shoulder to shoulder in a small space, without wearing masks and without any pretense of social distancing. Indeed, Defendant RNC moved the Convention from Charlotte, North Carolina to Jacksonville because the State

of North Carolina would not accede to its and Mr. Trump's demands that they be permitted to pack thousands of persons into the convention facilities, in close proximity and in a closed space in violation of safe COVID-19 health practices.

31. Although Defendant RNC's National Convention had long been planned for Charlotte and substantial investment was made by the local community in preparation for the Convention, President Trump refused to hold the Convention in Charlotte if he were not permitted to have a large crowd in the convention center. In communications with the Governor of North Carolina, President Trump insisted the convention center be filled to full capacity, stating "I don't want to be sitting in a place that's 50% empty" and "We can't do social distancing". [*The Washington Post*, June 9, 2020] Accordingly, Trump tweeted "Because of @NC-Governor, we are now forced to seek another State to host the 2020 Republican National Convention". [*Business Insider*, June 3, 2020, Pg. 3] As explained by the Governor of North Carolina, "We have been committed to a safe RNC Convention in North Carolina and it's unfortunate they never agreed to scale down and make changes to keep people safe. ... Protecting public health and safety during this pandemic is a priority." [*Business Insider*, P. 4]

32. Consequently, the Mayor of the City of Jacksonville and the Governor of the State of Florida solicited the RNC to place its Convention in Jacksonville, Florida. Pursuant to the President's demands that he be permitted to appear before a packed house of enthusiastic supporters, the RNC contracted with Defendants CITY and ASM GLOBAL to house the Republican National Convention in VyStar Veterans Memorial Arena on August 24-27, 2020.

33. At the time Defendants City and ASM Global agreed to Mr. Trump's demands and made the VyStar Arena the centerpiece of convention activities, VyStar Veterans Memorial Arena was closed through September because "The health and safety of our guests remains our highest priority..." (www.jaxevents.com) In conjunction with closing the Arena through September 2020 because of COVID-19 infections, numerous concerts and events (including the August 24, 2020 Journey concert and the Backstreet Boys' September 25, 2020 concert) were, at substantial cost and inconvenience, rescheduled for 2021.

The Convention in Jacksonville

34. The VyStar Arena has a maximum capacity of 15,000. The Republican Party of Duval County has reported it expects at least 12,000 to 15,000 people inside the VyStar Veterans Memorial Arena during the Convention. City officials have worked with Visit Jacksonville to secure more than 10,000 hotel rooms for Defendant RNC. People attending the Convention include delegates from all fifty states of the United States. In addition, thousands of volunteers to help staff the Convention are being recruited. Charlotte organizers estimated that some 50,000 visitors were expected in conjunction with the Convention. [See generally, Jacksonville Daily Record, June 25, 2020, P. 6] The proposed Convention in Jacksonville falls squarely within the CDC's definition of a "highest risk" spreading event: "Highest risk: Large in-person gatherings where it is difficult for individuals to remain spaced at least 6 feet apart and attendees travel from outside the local area." [<https://www.cdc.gov/coronavirus/2019-ncov/community/large-events/considerations-for-events-gatherings.html>]

35. The COVID-19 virus has especially severe effects on older individuals and persons with preexisting conditions such as asthma, heart disease or autoimmune susceptibility. Some 80% of the persons who have died from COVID-19 are over the age of 60. The disease has had a highly disproportionate adverse impact on African Americans, with particularly high morbidity and mortality rates.

36. It is undisputed that in addition to social distancing and wearing a mask, it is much safer to conduct group activities outdoors than in a confined space. TIAA Bank Field, located a couple of blocks from VyStar Arena, has the capacity to seat 12,000-15,000 persons while observing social distancing and assuring fresh airflow. However, President Trump has made it clear that he wants an indoor, enthusiastic “packed house”. This creates a public image and personal gratification desired by Mr. Trump.

37. Mr. Trump and the RNC moved the Convention from Charlotte to Jacksonville in order to avoid compliance with COVID-19 safe-health practices and carry on their business in closed spaces, crowded settings and close contact among the attendees. Consistent with Mr. Trump’s demands at a rally in Tulsa, Oklahoma on June 20, 2020, Mr. Trump’s staff removed “Do Not Sit Here, Please!” stickers from seats in the BOK Center arena (19,000 seat capacity) which the management company planned for 12,000 seats to keep people apart. When only about 6,500 people showed up, many were corralled into a compact area, ignoring the empty seats and social distancing, and like Mr. Trump, the great majority did not wear masks.

38. Subsequently, and in conjunction with the 4th of July holiday, the Trump Campaign continued to have political rallies where large groups of people were congregated together in close proximity, and like their leader Mr. Trump, most did not

wear masks; Mr. Trump continued to dismiss the seriousness of the epidemic in the United States which now is the largest in the world and rapidly growing; and falsely claimed that 99% of Coronavirus cases are “totally harmless”. In truth, 40% to 80% of people have mild or no symptoms, but are nevertheless highly contagious, thus unwittingly spreading COVID-19 to others who may suffer severe symptoms or death.

39. Recognizing the health risks of large groups of people gathering indoors, at the Trump/RNC rally in Tucson, Arizona, the attendees were required to execute waivers of liability for becoming infected with COVID-19 as a result of the rally. However, such efforts to insulate themselves from liability by Trump, the RNC and host parties does not waive the rights or ameliorate the harm to healthcare providers, first responders or Plaintiffs who may be infected by attendees; it does not waive or assuage the human and economic loss to restaurant and hotel employees who become infected as a result of the attendee's disease; or the harm to residents of the neighborhood and essential service providers who come in contact with and are infected by the attendees; or the public interest in maintaining healthy citizens and a healthy community.

40. Events around the world have been studied to determine chief causes of major outbreaks. For example, a choir practice in Washington State infected approximately 52 people and a mega church in Seoul, Korea was the primary source of the majority of initial infections in South Korea. See <https://www.scientificamerican.com/article/how-superspreading-events-drive-most-covid-19-spread1>; see also <https://www.news4jax.com/news/local/2020/06/15/woman-15-friends-test-positive-for-coronavirus-after-night-out-at-lynchs>.

41. Statistically, at least 1% - 10% of the attendees at the Convention will already be infected and contagious with or without symptoms and will infect other attendees and persons they come in contact with throughout the community, causing serious illness and death to countless citizens who otherwise would not have been infected.

42. The Republican National Convention on August 24-27, 2020 in Jacksonville, Florida involving tens of thousands of people congregating together may cause COVID-19 to spread beyond anything experienced in the world to date. The Republic National Convention envisioned by Mr. Trump and Defendant will result in a previously unprecedented super spreader event which will not only result in a massive number of illnesses among the people in attendance, but will spread COVID-19 throughout Jacksonville and Northeast Florida.

43. This action is brought to protect the interests of Plaintiffs and the public and is not a political matter. Whether the subject nuisance is created by some other organization or Defendant RNC is irrelevant to the harm to Plaintiffs and the community caused by such nuisance.

Nuisance

44. A nuisance is anything that “tends to annoy the community [or] injure the health of the community ...”. (Section 823.05(1), Florida Statutes) Citizens such as Plaintiffs have a legal right to protect their health and wellbeing from a nuisance. “[A]ny citizen of the county may sue in the name of the state or his or her relation to enjoin the nuisance, the person or person maintaining it, and the owner or agent of the building or ground on which the nuisance exists”. (Section 60.05(1), Florida Statutes) This action is

being brought for a Declaration by this Court that the Convention as specified and conducted by Mr. Trump and the RNC in Jacksonville, FL on August 24-27, 2020, is a nuisance detrimental to the health and welfare of Plaintiffs and the community of the City of Jacksonville, Florida.

45. As provided by Florida law, an action to abate a nuisance may be brought to prohibit the creation of a nuisance. Based on existing data and the course of COVID-19 in Jacksonville, Florida, it is inevitable that the epidemic will worsen through August 2020 and, in all events, steps necessary to protect Plaintiffs and the community from the spread of COVID-19 will continue to exist in the future, including August 24-27, 2020. As provided by Section 86.051, Florida Statutes, "Any declaratory judgment rendered pursuant to this chapter may be rendered by way of anticipation with respect to any act not yet done or any event which has not yet happened, and in such case the judgment shall have the same binding effect with respect to that future act or event, and the rights or liability to arise therefrom, as if that act or event had already been done or had already happened before the judgment was rendered".

46. All conditions precedent to the bringing of this action have been performed or have occurred.

47. Upon this Court's Declaration that the Republican National Convention and the conduct demanded by the President and RNC for carrying out the Convention are a nuisance, Plaintiffs seek all relief necessary to protect Plaintiffs and the public from such nuisance and to protect their rights and privileges as residents and citizens of Duval County and the City of Jacksonville to be free from the injurious and unsafe practices inherent in such nuisance, including:

(a) That the Arena remain closed or, if opened, that admittance be limited to no more than 2,500 persons; that at least 12,500 seats of the arena be isolated or roped off, or such number as necessary to provide a seated distance of at least six (6) feet between each person and other persons in the Arena; and that attendees be required to sit in the designated open seats or if standing, stand in designated places six (6) feet from any other person.

(b) That all persons, including attendees, while in or on the grounds of the Arena, be required to wear masks and maintain safe distancing from other persons of at least six (6) feet at all times; and that any person not wearing a mask or refusing to follow safe COVID-19 protocols be immediately removed from the Arena grounds.

(c) That Defendants disinfect all surfaces in and around the Arena touched by attendees or other persons with the necessary frequency as necessary and proper to minimize the risk of contamination and transmission of COVID-19.

(d) That Defendants provide adequate hand sanitizer and personal disinfectant at all entrances and exits and at strategic locations throughout the Arena.

(e) That Defendants have sufficient signage in and around the Arena to advise all attendees of required social distancing, mask wearing and good hygiene practices.

(f) That Defendants establish and follow protocols to identify anyone who may attempt to enter the area who has been exposed to COVID-19 and is at risk or who has symptoms; establish and follow tracking protocols for any attendee

who may have symptoms or test positive for COVID-19; and take all necessary steps reasonable and appropriate to avoid or minimize the risk of COVID-19 spread in and around the Arena and to track any persons and their contacts who pose such risks.

(g) That Defendants provide adequate personnel to police and enforce the COVID-19 health-safety measures by all persons in and around the Arena at all times during the Convention.

(h) That this Court make such other Orders and Decrees as necessary and proper to the fullest exercise of this Court's jurisdiction and the protection of the health and welfare of the citizens of Jacksonville, Duval County, Florida.

(i) That Plaintiffs be awarded the costs and fees of this action as consistent with this Court's equity jurisdiction.

WHEREFORE, Plaintiffs demand judgment against Defendants.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of Plaintiffs' **Complaint** has been provided to the Sheriff for service with the Summons and Complaint upon the Defendants in this case.



Attorney