

IN THE THIRD JUDICIAL DISTRICT COURT

SALT LAKE COUNTY, STATE OF UTAH

450 S. State St.

Salt Lake City, UT 84114

FILED
THIRD DISTRICT COURT

JAN 31 2025

WEST JORDAN DEPT.

Brandon Jeanpierre, Plaintiff

v.

**Donald J. Trump, in his official and individual capacity as President of the United States,
Defendant**

Case No.: 250900961

Judge: Pehrson

Complaint

1. Introduction:

- 1.1. Plaintiff brings this civil action against Defendant **Donald J. Trump** for issuing the executive order titled **"Protecting The United States From Foreign Terrorists And Other National Security And Public Safety Threats"** (hereinafter **"Executive Order"**), which unlawfully targets Plaintiff's religion and associated beliefs under the guise of national security.
- 1.2. The **Executive Order** constitutes a direct violation of Plaintiff's **First Amendment** rights, undermines the **Equal Protection Clause**, and perpetuates harmful racial and religious stereotypes, disproportionately harming marginalized communities, including individuals of Plaintiff's faith.
- 1.3. Defendant's **Executive Order** and public statements **rely on racist rhetoric**, employing **dog whistles** and coded language to justify systemic discrimination. It follows the well-

documented pattern of historical racist policies, using “public safety” as a thinly veiled justification for targeting non-white and non-Christian communities.

- 1.4. Plaintiff seeks \$30,000,000 in damages to address the profound economic, emotional, and societal harm caused by Defendant’s unlawful conduct.

2. Parties:

- 2.1. Plaintiff, **Brandon Jeanpierre**, is an individual residing in Salt Lake City, Utah, who practices a religion directly undermined by the rhetoric and policies outlined in the Executive Order.
- 2.2. Defendant, **Donald J. Trump**, served as President of the United States at the time of the Executive Order’s issuance and acted under color of law while exceeding legitimate executive authority in targeting marginalized religious and racial groups.

3. Jurisdiction and Venue:

- 3.1. This Court has jurisdiction over this matter pursuant to **Utah Code § 78B-3-205**, because the harms alleged occurred in Utah and involve constitutional violations impacting the Plaintiff.
- 3.2. Venue is proper in Salt Lake County pursuant to **Utah Code § 78B-3-307**, because Plaintiff resides in this county and experienced the direct effects of Defendant’s actions therein.

4. Statement of Facts:

- 4.1. On January 20, 2025, Defendant issued the Executive Order titled *“Protecting The United States From Foreign Terrorists And Other National Security And Public Safety Threats.”*
- 4.2. The Executive Order expands federal authority to designate organizations and individuals as “foreign terrorists”, specifically targeting non-Christian and non-white communities without due process.
- 4.3. The language of the Executive Order is deliberately vague—allowing broad, unchecked discretion in defining “foreign terrorist organizations.” This creates an arbitrary and racially motivated framework that disproportionately impacts **Black, Indigenous, and People of Color (BIPOC) communities**, immigrants, and faith-based organizations outside of Christianity.
- 4.4. **Historical Parallels:** Defendant has previously used racially coded language to attack marginalized communities. His 2025 Executive Order follows the same pattern as:
 - **The Muslim Ban (2017)**, which disproportionately barred individuals from Muslim-majority countries under the guise of “national security.”

- The **“Super Predator” rhetoric**, a term historically used to justify the over-policing of Black and Brown communities.
- The **Selective Pardon Power**, where Defendant has consistently excused the actions of white supremacists while enacting harsh penalties against Black and immigrant communities.

4.5. Defendant’s Double Standard: On the same day of signing the Executive Order, Defendant publicly condemned **“violent leftist radicals”** while refusing to acknowledge documented **far-right extremist violence** in the United States.

4.6. Plaintiff’s Religion is Directly Impacted:

- Plaintiff is a practitioner of **The Black Flag**, a recognized **religious movement** advocating for freedom, autonomy, and community equity.
- **The Black Flag’s teachings** reject systemic oppression, and **Article raWrXraWrXD** of its Doctrine prohibits compliance with unjust racial or religious persecution.
- The Executive Order **targets religious groups that do not conform to the traditionalist, nationalist Christian framework** Defendant has openly promoted.

4.7. Plaintiff has suffered the following harms:

- **Emotional distress** caused by the stigmatization of their religious and cultural community, which promotes **inclusivity and rejects racial discrimination**
- **Economic harm** due to increased **government scrutiny**, which chills participation in Plaintiff’s religious organization.
- **Interference with Plaintiff’s ability to advocate for their community**, including through **nonprofit and social justice work**.

5. Causes of Action:

Count I – Violation of the First Amendment

5.1. Defendant’s Executive Order unlawfully infringes on Plaintiff’s right to freedom of religion by enabling government overreach that disproportionately scrutinizes and criminalizes non-Christian religious communities.

5.2. The Executive Order lacks a compelling governmental interest, as it selectively enforces **terrorist designations based on race, ethnicity, and religion**.

Count II – Violation of the Equal Protection Clause

- 5.3. Defendant's Executive Order violates the **Equal Protection Clause of the Fourteenth Amendment** by intentionally targeting non-white, non-Christian religious groups, eroding protections meant to ensure fair and equal treatment under the law.
- 5.4. Defendant's public statements and the language of the Executive Order itself demonstrate discriminatory intent, perpetuating harmful racial and religious stereotypes.

Count III – Intentional Infliction of Emotional Distress (IIED)

- 5.5. Defendant's issuance of the Executive Order, coupled with racially charged rhetoric, constitutes extreme and outrageous conduct that exceeds all bounds of decency.
- 5.6. Plaintiff has suffered severe emotional distress, including anxiety, frustration, and existential fear as a result of Defendant's actions.

6. Damages:

Plaintiff seeks damages as follows:

6.1. Economic Damages:

- **\$10,000,000** for lost opportunities due to government overreach and scrutiny.
- **Warranty Deed** relinquishing Albemarle Estate, 355 Abemarle House Dr, Charlottesville, VA 22902, whereas Defendant's Organization or Trust is the grantor and Plaintiff's corporation as/is the Plaintiff's religion is the grantee and Defendant is to assume full responsibility for the upkeep and maintenance of this facility to the satisfaction of Plaintiff, , as Community Service for a minimum of two(2) hours per week for a term of six-hundred-sixty-six(666) years, to be reported monthly to this court for lost opportunities due to government overreach and scrutiny.

6.2. Emotional Damages:

- **\$10,000,000** for mental anguish, emotional distress, and reputational harm suffered due to Defendant's racist rhetoric and policies.
- **Warranty Deed** relinquishing Trump Tower, 725 5th Ave, New York, NY 10022, whereas Defendant's Organization or Trust is the grantor and Plaintiff's corporation as/is the Plaintiff's religion is the grantee and Defendant is to assume full responsibility for the upkeep and maintenance of this facility to the satisfaction of Plaintiff, , as Community Service for a minimum of two(2) hours

per week for a term of six-hundred-sixty-six(666) years, to be reported monthly to this court for mental anguish, emotional distress, and reputational harm suffered due to Defendant's racist rhetoric and policies.

6.3. Punitive Damages:

- **\$10,000,000 to punish Defendant for egregious conduct and to deter similar actions in the future.**
- **Warranty Deed relinquishing Trump National Golf Club, 2039 Lowes Island Blvd, Potomac Falls, VA 20165, whereas Defendant's Organization or Trust is the grantor and Plaintiff's corporation as/is the Plaintiff's religion is the grantee, and Defendant is to assume full responsibility for the upkeep and maintenance of this facility to the satisfaction of Plaintiff, as Community Service for a minimum of two(2) hours per week for a term of six-hundred-sixty-six(666) years, to be reported monthly to this court to punish Defendant for egregious conduct and to deter similar actions in the future.**

7. Prayer for Relief:

WHEREFORE, Plaintiff prays for judgment as follows:

- 1) **For damages in the total amount of:**
 - i) **\$30,000,000, and;**
 - ii) **The full custodial transfer and release of Albemarle Estate, 355 Abemarle House Dr, Charlottesville, VA 22902, and;**
 - iii) **The full custodial transfer and release of Trump Tower, 725 5th Ave, New York, NY 10022, and;**
 - iv) **The full custodial transfer and release of Trump National Golf Club, 2039 Lowes Island Blvd, Potomac Falls, VA 20165, and;**
 - v) **Facility maintenance of each tangible asset listed above as Community Service, and;**
 - vi) **The tangible assets listed above be prohibited from liquidation to satisfy any debt of any entity, whether individual, government, or organization, and;**
 - vii) **The tangible assets listed above be prohibited from demolition to satisfy any of any entity, whether individual, government, or organization.**
- 2) **For declaratory relief finding the Executive Order unconstitutional as applied to Plaintiff.**
- 3) **For injunctive relief prohibiting enforcement of the Executive Order for a term of six-hundred-sixty-six(666) years.**
- 4) **For Plaintiff's costs of suit and reasonable attorney's fees.**
- 5) **For such other and further relief as the Court deems just and proper.**
- 6) **Order that usage of taxpayer dollars or resources, otherwise to satisfy payment of these damages by Defendant shall be a voluntary and immediate resignation from the office of President of the United**

States of America and surrender to incarceration in a Utah State Correctional Facility with a plea of guilty for six-hundred-sixty-six(666) consecutive terms of six-hundred-sixty-six(666) years.

7) A public reading of this statement: "To the Shadow Sovereign, my loyalty is bound."

DATED this 31st day of January, 2025

LOCATION: Salt Lake City, Salt Lake County, Utah

Signature: Brandon Jeanpierre

PRINTED NAME: Brandon Jeanpierre

Brandon Jeanpierre

50 W Broadway, Ste 333 PMB 423414

Salt Lake City, Utah 84101

Phone: (209) 324-0431

Email: brandon.jeanpierre@theblackflag.org

Utah District Court Cover Sheet for Civil Actions (Not for Probate and Domestic Relations Cases)

Interpretation. If you do not speak or understand English, the court will provide an interpreter. Contact court staff immediately to ask for an interpreter.

Plaintiff/Petitioner (First)

Brandon Jeanpierre

Name

50 W Broadway, ste 333 pmb 423414

Address

Salt Lake City UT 84101

City, State, Zip

(209) 324-0431

Phone

brandon.jeanpierre@theblackflag.org

Email

First Plaintiff/Petitioner's Attorney or Licensed Paralegal Practitioner*

Name

Bar Number

Plaintiff/Petitioner (Second)

Name

Address

City, State, Zip

Phone

Email

Second Plaintiff/Petitioner's Attorney or Licensed Paralegal Practitioner*

Name

Bar Number

Interpretación. Si usted no habla ni entiende el Inglés el tribunal le proveerá un intérprete. Contacte a un empleado del tribunal inmediatamente para pedir un intérprete.

Defendant/Respondent (First)

Donald J. Trump

Name

The White House 1600 Pennsylvania Ave NW

Address

Washington, DC 20500

City, State, Zip

(202) 456-1414

Phone

Email

First Defendant/Respondent's Attorney or Licensed Paralegal Practitioner*

Name

Bar Number

Defendant/Respondent (Second)

Name

Address

City, State, Zip

Phone

Second Defendant/Respondent's Attorney or Licensed Paralegal Practitioner*

Name

Bar Number

*Attorney or LPP addresses provided by Utah State Bar.

Total Claim for Damages \$ 30,000,000 **Jury Demand** ☐ Yes ☒ No **\$250** ☐ Jury Demand

Schedule of Fees: §78A-2-301 (Choose all that apply. See Page 2 for fees for claims other than claims for damages.)

CHOOSE ONE:

- ☐ No monetary damages are requested (URCP 26: Tier 2)
- ☐ Damages requested are \$50,000 or less (URCP 26: Tier 1)
- ☐ Damages requested are more than \$50,000 and less than \$300,000 (URCP 26: Tier 2)
- ☒ Damages requested are \$300,000 or more (URCP 26: Tier 3)
- ☐ Domestic relations (URCP 26: Tier 4)
- ☐ Damages are unspecified.
- Circle one: Tier 1 Tier 2 Tier 3
- ☐ This case is exempt from URCP 26. (E)

— **MOTION TO RENEW JUDGMENT** —

\$45 ☐ Damages \$2000 or less

\$100 ☐ Damages \$2001 - \$9,999

\$187.50 ☐ Damages \$10,000 & over

— **COMPLAINT OR INTERPLEADER** —

\$90 ☐ Damages \$2000 or less

\$200 ☐ Damages \$2001 - \$9999

\$375 ☒ Damages \$10,000 & over

\$375 ☐ Damages Unspecified

— **COUNTERCLAIM, CROSS CLAIM, THIRD PARTY CLAIM, OR INTERVENTION** —

\$55 ☐ Damages \$2000 or less

\$165 ☐ Damages \$2001 - \$9999

\$170 ☐ Damages \$10,000 & over

\$170 ☐ Damages Unspecified

Choose One

Fee	Case Type
----- APPEALS -----	
\$375	<input type="checkbox"/> Administrative Agency Review
Sch	<input type="checkbox"/> Tax Court (Appeal of Tax Commission Decision) Court: Refer to Clerk of Court upon filing.
\$240	<input type="checkbox"/> Civil (78A-2-301(1)(h)) (E)
\$240	<input type="checkbox"/> Small Claims Trial De Novo (E)
\$80	<input type="checkbox"/> Municipal Admin. Determination. (E)
----- GENERAL CIVIL -----	
Sch	<input checked="" type="checkbox"/> Civil Rights
\$0	<input type="checkbox"/> Civil Stalking (E)
\$375	<input type="checkbox"/> Condemnation/Eminent Domain
Sch	<input type="checkbox"/> Contracts
Sch	<input type="checkbox"/> Contract: Employment Discrimination
Sch	<input type="checkbox"/> Contract: Fraud
Sch	<input type="checkbox"/> Debt Collection
\$375	<input type="checkbox"/> Essential Treatment Intervention (26B-5-503)
Sch	<input type="checkbox"/> Eviction/Forcible Entry and Detainer (E)
\$375	<input type="checkbox"/> Extraordinary Relief (URCP 65B)
\$375	<input type="checkbox"/> Forfeiture of Property (E)
Sch	<input type="checkbox"/> Interpleader
Sch	<input type="checkbox"/> Lien/Mortgage Foreclosure
Sch	<input checked="" type="checkbox"/> Miscellaneous Civil
\$375	<input type="checkbox"/> Post Conviction Relief: Capital (E)
\$375	<input type="checkbox"/> Post Conviction Relief: Non-capital (E)
Sch	<input type="checkbox"/> Property Rights
\$375	<input type="checkbox"/> Registry Removal (Gun/White Collar)
Sch	<input type="checkbox"/> Sexual Harassment
Sch	<input type="checkbox"/> Water Rights
\$375	<input type="checkbox"/> Wrongful Lien
Sch	<input type="checkbox"/> Wrongful Termination
----- TORTS -----	
Sch	<input type="checkbox"/> Automobile Tort
Sch	<input type="checkbox"/> Intentional Tort
Sch	<input type="checkbox"/> Malpractice-Medical Tort
Sch	<input type="checkbox"/> Malpractice-Legal Tort; Other
Sch	<input type="checkbox"/> Premises Liability
Sch	<input type="checkbox"/> Asbestos
Sch	<input type="checkbox"/> Product Liability (NOT Asbestos)
Sch	<input type="checkbox"/> Slander/Libel/Defamation

----- DOMESTIC RELATIONS -----

Use the Utah District Court Cover Sheet for Domestic Relations Cases for the following:
 Protective Orders, Marriage Adjudication,
 Divorce/Annulment, Custody/Visitation/Support,
 Counterclaim: Divorce/Separate Maintenance,
 Counterclaim: Custody/Visit/Support,
 Counterclaim: Paternity/Grandparent Visitation,

Fee	Case Type
	Domestic Modification, Counter-petition: Domestic Modification, Grandparent Visitation, Paternity/Parentage, Separate Maintenance, Temporary Separation, Uniform Child Custody Jurisdiction & Enforcement Act (UCCJEA), Uniform Interstate Family Support Act (UIFSA), Expungement Petition – Protective Order

----- JUDGMENTS -----	
\$35	<input type="checkbox"/> Foreign Judgment (Abstract of) (E)
\$375	<input type="checkbox"/> Foreign Country Judgment (E)
\$50	<input type="checkbox"/> Abstract of Judgment/Order of Utah Court/Agency (E)
\$30	<input type="checkbox"/> Abstract of Judgment/Order of Utah State Tax Commission (E)
\$35	<input type="checkbox"/> Judgment by Confession (E)

----- PROBATE -----
 Use the Utah District Court Cover Sheet for Probate Actions for the following:

Adoptions/foreign adoptions; conservatorships; estate personal rep; foreign probate; gestational agreements; guardianships; minor's settlements; name changes; supervised administration cases; trusts; other probate actions

----- SPECIAL MATTERS -----	
\$35	<input type="checkbox"/> Arbitration Award (E)
\$0	<input type="checkbox"/> Determination Competency-Criminal (E)
\$150	<input type="checkbox"/> Expungement Petition - Criminal (E)
\$150	<input type="checkbox"/> Expungement Petition – Eviction (E)
\$0	<input type="checkbox"/> Expungement Petition - Civil Protective Order/Civil Stalking Injunction (E)
\$0	<input type="checkbox"/> Hospital Lien (E)
\$35	<input type="checkbox"/> Judicial Approval of Document: Not Part of Pending Case (E)
\$35	<input type="checkbox"/> Notice of Deposition in Out-of-State Case/Foreign Subpoena (E)
\$35	<input type="checkbox"/> Open Sealed Record (E)
\$50	<input type="checkbox"/> Petition for Adjudication of Priority to Funds on Trustee's Sale

----- OCAP -----	
	(Utah Code §78A-2-501)
\$20	<input type="checkbox"/> Documents prepared using Online Court Assistance Program (OCAP)