

IN THE THIRD JUDICIAL DISTRICT COURT  
SALT LAKE COUNTY, STATE OF UTAH  
450 S. State St.  
Salt Lake City, UT 84114

**Brandon Jeanpierre, Plaintiff**

v.

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

Case No.: 250900783

Judge: Pettit

## **Complaint**

### **1. Introduction:**

1.1 Plaintiff brings this civil action against Defendant Donald J. Trump for issuing the executive order titled *"Ending Radical and Wasteful Government DEI Programs and Preferencing"* (hereinafter "Executive Order"), which directly undermines Plaintiff's First Amendment rights and disproportionately harms Plaintiff's religion and associated community.

1.2 Plaintiff alleges that the Executive Order reflects a targeted and intentional effort to dismantle critical Diversity, Equity, and Inclusion (DEI) programs designed to address systemic inequities, thereby violating principles of equal protection and freedom of religion.

1.3 Defendant's actions are part of a broader pattern of discriminatory conduct, perpetuated through racially coded language ("dog whistles"), and create a hostile environment for individuals and communities striving for equity in public service.

1.4 Plaintiff seeks \$30,000,000 in damages to address the 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, and a member of a religious and cultural community that has benefited from DEI initiatives dismantled by 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 both under the color of law and outside legitimate executive authority in targeting marginalized 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 *"Ending Radical and Wasteful Government DEI Programs and Preferencing."*

4.2 The Executive Order eliminates federal funding, policies, and programs aimed at promoting Diversity, Equity, and Inclusion, labeling such initiatives as “radical” and “wasteful.”

4.3 The language of the Executive Order, combined with Defendant’s public statements, employs racially coded terms historically used to delegitimize efforts to address systemic inequities.

4.4 Defendant has publicly expressed disdain for DEI programs, framing them as unnecessary and divisive, while promoting policies and rhetoric that disproportionately benefit majority groups and harm minorities.

4.5 Plaintiff’s religion and community have been specifically harmed by the elimination of DEI initiatives, as these programs have been instrumental in reducing barriers to equitable participation in public service and economic opportunities.

4.6 Defendant’s concurrent public statements on January 20, 2025, including references to “restoring traditional values,” underscore the discriminatory intent behind the Executive Order.

4.7 Plaintiff has suffered the following harms:

- Emotional distress stemming from the stigmatization of their religion and community as obstacles to “traditional values.”
- Economic harm caused by the dismantling of programs that supported equitable access to resources and opportunities for members of Plaintiff’s community.
- Interference with Plaintiff’s efforts to advocate for their religious and cultural community, including through nonprofit initiatives.

4.8 Defendant’s actions reflect a double standard in applying principles of equity, furthering structural inequities while falsely claiming to promote “merit” and fiscal responsibility.

## **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 dismantling programs essential to the equitable treatment of religious minorities in government service and public initiatives.

5.2 The Executive Order lacks a compelling governmental interest and fails to meet the constitutional standard of narrowly tailored actions.

### **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 DEI programs that address historic inequities faced by Plaintiff and similarly situated groups.

5.4 Defendant’s public statements, including references to “radical” and “wasteful” programs, demonstrate discriminatory intent and perpetuate harmful stereotypes.

### **Count III – Intentional Infliction of Emotional Distress (IIED)**

5.5 Defendant’s actions in issuing the Executive Order, coupled with racially and religiously charged rhetoric, constitute extreme and outrageous conduct beyond the bounds of decency.

5.6 Plaintiff has suffered severe emotional distress, including anxiety, frustration, and despair, as a result of Defendant's actions.

**6. Damages:**

Plaintiff seeks damages as follows:

**6.1 Economic Damages:**

- \$10,000,000 for lost opportunities and the elimination of programs that supported Plaintiff's community.

**6.2 Emotional Damages:**

- \$10,000,000 for mental anguish, emotional distress, and reputational harm caused by the stigmatization of Plaintiff's religion and community.

**6.3 Punitive Damages:**

- \$10,000,000 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 \$30,000,000.
2. For declaratory relief finding the Executive Order unconstitutional as applied to Plaintiff.
3. For injunctive relief prohibiting enforcement of the Executive Order against 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 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 26th day of January, 2025.

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PRINTED NAME: Brandon Jeanpierre

DATE: 1/26/25

Signature: 