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**FILED**  
**THIRD DISTRICT COURT**

FEB 10 2025

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

**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.: 250901137

Judge: PETIT

### **Complaint**

#### **1. Introduction:**

- 1.1. Plaintiff brings this civil action against Defendant **Donald J. Trump** for issuing the executive order titled **"Keeping Men Out of Women's Sports"** (hereinafter "Executive Order"), which unlawfully targets **Plaintiff's religion** and associated beliefs under the guise of **protecting women's sports**.
- 1.2. The **Executive Order** constitutes a direct violation of **Plaintiff's First Amendment rights**, undermines the **Equal Protection Clause**, and perpetuates **harmful stereotypes** that disproportionately harm marginalized communities, including individuals of Plaintiff's faith.
- 1.3. Defendant's Executive Order and public statements **rely on bigoted rhetoric**, employing **dog whistles** and coded language to justify systemic discrimination. It follows the **well-documented historical pattern** of using **misinformation and social panic** to justify policies that **exclude, stigmatize, and erase gender-diverse individuals**.
- 1.4. Plaintiff seeks **\$666,000,000 in damages** as well as other non-monetary restitution 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 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 **February 2, 2025**, Defendant issued the **Executive Order** titled *"Keeping Men Out of Women's Sports."*
  - 4.2. The **Executive Order** prohibits **transgender women** from participating in federally regulated women's sports, barring them from competition at the **high school, collegiate, and professional levels**.
  - 4.3. The **language of the Executive Order** employs **dangerous and misleading rhetoric**, including the framing of gender-diverse individuals as a **threat to fairness in women's sports**. This follows the **historic trend of using fabricated moral panic** to justify exclusionary policies.
  - 4.4. Defendant's **public statements on the day of signing** emphasized **"restoring biological truth"** and **"saving women's sports from radical gender ideology,"** aligning his language with known **bigoted rhetoric** that seeks to erase **transgender identities** from public life.
  - 4.5. Defendant has a **documented history of bigoted statements and policies** targeting **LGBTQ+ individuals, people of color, and those who advocate for inclusive policies**. His **2025 Executive Order** follows the same pattern as:
    - The **2017 Transgender Military Ban**, which falsely claimed transgender service members harmed military readiness.
    - The **2025 Ban on DEI Programs**, which framed diversity and inclusion as **"radical."**
    - The **Erasure of Gender-Affirming Protections**, where Defendant's administration rolled back policies ensuring equal access to healthcare for transgender individuals.
  - 4.6. **Defendant's Double Standard:** On the same day of signing the Executive Order, Defendant **publicly condemned "radical gender ideology,"** while simultaneously **ignoring scientific consensus that biological sex and gender identity exist along a spectrum**.
  - 4.7. **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** explicitly recognize **gender autonomy as a sacred principle**.
    - **Article raWrXraWrXD of its Doctrine** prohibits compliance with **unjust systemic erasure of identity**.
    - The **Executive Order** directly contradicts the **religious doctrine Plaintiff adheres to**, making it a **direct violation of First Amendment protections**.
  - 4.8. **Plaintiff has suffered the following harms:**
    - **Emotional distress** caused by the **stigmatization of their religious and cultural community**, which promotes **gender inclusivity and rejects systemic discrimination**.

- **Economic harm** due to increased **government hostility** toward gender-diverse individuals, 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 enforcing policies that contradict sacred religious doctrine regarding gender identity.
- 5.2. The Executive Order fails to meet constitutional scrutiny under the First Amendment, as it targets non-traditional gender identities while falsely claiming to advance fairness in women's sports.

### **Count II – Violation of the Equal Protection Clause**

- 5.3. Defendant's Executive Order violates the Equal Protection Clause of the Fourteenth Amendment by enforcing a targeted policy against transgender individuals without a compelling governmental interest.
- 5.4. The Executive Order selectively enforces identity-based discrimination under the guise of "fairness," while excluding cisgender athletes from similar scrutiny.

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

- 5.5. Defendant's issuance of the Executive Order, coupled with anti-LGBTQ+ 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:**

- **\$222,000,000** for lost opportunities due to government overreach and scrutiny.
- **92% control** of all cryptocurrency assets held by defendant, trusts, or organization/corporations of interest to the defendant, to be transferred on a semi-weekly basis to a termination point of designation by the entity definitive of the plaintiff's religion due to government overreach and scrutiny.

### **6.2. Emotional Damages:**

- **\$222,000,000** for mental anguish, emotional distress, and reputational harm suffered due to Defendant's erasure of religiously recognized gender autonomy.

### **6.3. Punitive Damages:**

- **\$222,000,000** to punish Defendant for egregious conduct and to deter similar actions in the future.
- Defendant must relinquish all titles, memberships, positions, interests, and shares in "The Trump Organization" for egregious conduct and to deter similar actions in the future.
- Appointment of Plaintiff to possess Power of Attorney over Defendant for a term of six-hundred-sixty-six(666) years 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:

- a) \$666,000,000, and;
- b) Transfer of majority control of cryptocurrency assets.
- 2) The full custodial transfer of interests in "The Trump Organization".
- 3) Power of Attorney over defendant.
- 4) For declaratory relief finding the Executive Order unconstitutional as applied to Plaintiff.
- 5) For injunctive relief prohibiting enforcement of the Executive Order for a term of six-hundred-sixty-six (666) years.
- 6) For Plaintiff's costs of suit and reasonable attorney's fees.
- 7) For such other and further relief as the Court deems just and proper.
- 8) 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.
- 9) A public reading of this statement: "To the Shadow Sovereign, my loyalty is bound."

DATED this 9<sup>th</sup> day of February, 2025.

Location: Salt Lake City, Salt Lake County, Utah

PRINTED NAME: Brandon Jeanpierre

Signature: 

# 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 \$ 666,000,000** **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
<b>----- APPEALS -----</b>	
\$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)
<b>----- GENERAL CIVIL -----</b>	
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 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
<b>----- TORTS -----</b>	
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)