

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.: 250900945

Judge: Hruby · mills

Complaint

1. Introduction:

- 1.1. Plaintiff brings this civil action against Defendant **Donald J. Trump** for issuing the executive order titled **"Prioritizing Military Excellence and Readiness"** (hereinafter **"Executive Order"**), which unlawfully targets **Plaintiff's religion** and associated beliefs under the guise of **military preparedness**.
- 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 military policy as a vehicle to **exclude and erase minority groups** while publicly denying such intent.

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 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 27, 2025**, Defendant issued the Executive Order titled *"Prioritizing Military Excellence and Readiness."*

4.2. The Executive Order directs the **Department of Defense (DOD)** to **update medical standards and policies** to ensure that all service members meet "strict biological and psychological readiness criteria."

4.3. This Executive Order specifically targets individuals with **gender dysphoria**, stating that expressing a **gender identity divergent from one's biological sex** is inconsistent with military service requirements.

4.4. The Executive Order also mandates the **cessation of invented and identification-based pronoun usage within the Department of Defense**, a move that explicitly erases the **existence and validity of gender-diverse identities** in military settings.

4.5. The **targeting of gender identity within military policy** is a **historic strategy** used by bigoted administrations to **legitimize exclusionary policies while publicly denying discriminatory intent**.

4.6. 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**, where Defendant prohibited transgender individuals from serving in the military under false pretenses of “readiness.
- **The Don’t Ask, Don’t Tell Era**, which falsely framed LGBTQ+ service members as a “threat to morale.”
- **The Erasure of DEI Programs in 2025**, which Defendant justified using similarly coded language about “merit” and “standards.”

4.7. **Defendant’s Double Standard:** On the same day of signing the Executive Order, Defendant **publicly condemned “woke military culture”**, while simultaneously **praising an all-male, all-white Navy SEAL unit as the “gold standard of military discipline.”**

4.8. **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.**

4.9. **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 military readiness.

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 gender-diverse individuals without a compelling governmental interest.
- 5.4. The Executive Order selectively enforces identity-based discrimination under the guise of "military readiness," while excluding white male soldiers from parallel 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:

- \$10,000,000 for lost opportunities due to government overreach and scrutiny.
- Appointment of Plaintiff to possess Power of Attorney over Defendant for a term of six-hundred-sixty-six(666) years.

6.2. Emotional Damages:

- \$10,000,000 for mental anguish, emotional distress, and reputational harm suffered due to Defendant's erasure of religiously recognized gender autonomy.
- \$30,000,000 donated directly to Logan Pride and/or an organization or cause of his choosing to be Distributed all or in part between the individual and/or a given organization or cause at the discretion of this individual 000 for mental anguish,

emotional distress, and reputational harm suffered due to Defendant's erasure of religiously recognized gender autonomy.

6.3. Punitive Damages:

- **\$10,000,000 to punish Defendant for egregious conduct and to deter similar actions in the future.**
- **Transfer of Ownership** relinquishing ownership of **Trump Media and Technology Group Corporation (TMTG)**, whereas **Defendant's Organization or Trust** is the grantor and **Plaintiff's corporation as/is the Plaintiff's religion** is the grantee 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) **\$60,000,000, and;**
- ii) **Power of Attorney over defendant, and;**
- iii) **The full custodial transfer and release of Trump Media and Technology Group Corporation (TMTG).**

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

brandon.jeanpierre@theblackflag.org

Phone

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 \$ 60,000,000 **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)