

**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.: 250900784

Judge: Bates

Complaint

1. Introduction:

1.1 This civil action seeks declaratory relief, injunctive relief, damages, and punitive damages against Defendant Donald J. Trump for issuing the executive order titled *"Reforming The Federal Hiring Process And Restoring Merit To Government Service"* on January 20, 2025 (hereinafter "Executive Order").

1.2 Plaintiff alleges that this Executive Order violates the First Amendment by directly targeting Plaintiff's religion and undermining principles of equal protection through racially coded language and discriminatory intent.

1.3 Defendant's actions reflect a calculated effort to reestablish racially exclusionary hiring practices under the guise of "merit," leveraging historical dog whistles and perpetuating structural inequities in public service.

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

2. Parties:

2.1 Plaintiff, Brandon Jeanpierre, is an individual residing in Salt Lake City, Utah, who practices a faith adversely impacted by the language, implementation, and intent of 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 in his official capacity and in an individual capacity that exceeded legitimate executive authority.

3. Jurisdiction and Venue:

3.1 This Court has jurisdiction over this matter pursuant to Utah Code § 78B-3-205 because the events and harms described herein occurred in Utah.

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 effects of Defendant's conduct there.

4. Statement of Facts:

4.1 On January 20, 2025, Defendant issued the Executive Order titled *"Reforming The Federal Hiring Process And Restoring Merit To Government Service."*

4.2 The Executive Order imposes hiring practices that emphasize subjective and ambiguous metrics of “merit” over equity-focused considerations designed to address historic discrimination in government service.

4.3 Public statements and promotional materials surrounding the Executive Order employ racially coded language and “dog whistles,” evoking themes of exclusion historically associated with discriminatory policies.

4.4 Defendant’s history of statements and actions—including dismissive remarks about diversity programs, references to “reverse discrimination,” and opposition to affirmative action—demonstrates discriminatory intent behind the Executive Order.

4.5 Plaintiff’s faith and associated cultural practices have been stigmatized by the Executive Order, as it perpetuates stereotypes linking minority groups to incompetence and undermines progress toward inclusive public service hiring.

4.6 Plaintiff has suffered the following harms:

- Emotional distress stemming from the stigmatization of their religion and community.
- Economic harm due to increased discrimination and diminished opportunities for members of Plaintiff’s faith group in government service.
- Interference with Plaintiff’s ability to advocate for their community’s economic and social advancement.

4.7 Defendant’s statements made contemporaneously with the Executive Order, including references to restoring “traditional American values,” further demonstrate discriminatory intent and a double standard that disproportionately impacts Plaintiff’s religion and community.

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 reinforcing structural barriers that disproportionately harm members of Plaintiff’s faith group.

5.2 The Executive Order lacks a compelling governmental interest and is not narrowly tailored to achieve legitimate objectives, violating Plaintiff’s First Amendment protections.

Count II – Violation of the Equal Protection Clause

5.3 Defendant’s Executive Order violates the Equal Protection Clause of the Fourteenth Amendment by implementing policies that disproportionately harm minority and religious groups under the pretext of restoring “merit.”

5.4 Defendant’s language and public statements surrounding the Executive Order demonstrate discriminatory intent and perpetuate harmful stereotypes.

Count III – Intentional Infliction of Emotional Distress (IIED)

5.5 Defendant’s issuance of the Executive Order, coupled with racially charged and exclusionary rhetoric, was extreme and outrageous conduct that exceeded all bounds of decency.

5.6 Defendant’s actions caused Plaintiff severe emotional distress, including anxiety, frustration, and feelings of helplessness in the face of systemic injustice.

6. Damages:

Plaintiff seeks damages as follows:

6.1 Economic Damages:

- \$10,000,000 for economic harm, including lost opportunities and community-wide impacts caused by Defendant's discriminatory policies.

6.2 Emotional Damages:

- \$10,000,000 for mental anguish, emotional distress, and reputational harm suffered as a result of Defendant's actions.

6.3 Punitive Damages:

- \$10,000,000 to punish Defendant for egregious conduct and 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 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 24th day of January, 2025.

Brandon Jeanpierre
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PRINTED NAME: Brandon Jeanpierre

DATE: 1/24/25

Signature: 