

IN THE COMMON PLEAS COURT
WOOD COUNTY, OHIO

2021CV0084 - Matthew L Reger

DOUGLAS F. CUBBERLEY
CLERK OF COURTS WOOD COUNTY OHIO

STATE EX REL	:	
	:	
RIGHT TO LIFE ACTION	:	Case No.
COALITION OF OHIO	:	
c/o 405 Madison Ave., Ste 1100	:	Judge
Toledo, Ohio 43604	:	
&	:	
	:	COMPLAINT FOR DAMAGES and
GREATER TOLEDO AREA	:	<u>INJUNCTIVE RELIEF and/or</u>
RIGHT TO LIFE	:	<u>DECLARATORY JUDGMENT</u>
c/o 405 Madison Ave., Ste 1100	:	
Toledo, Ohio 43604	:	
	:	
&	:	Eugene F. Canestraro, Esq. (0025158)
	:	Cline, Cook & Weisenburger Co., LPA
JEFFREY BAREFOOT	:	405 Madison Ave., Suite 1100
114 W. 3 RD St.	:	Toledo, Ohio 43604
Perrysburg, Ohio 43551	:	Tel. (419) 321-6444
	:	Fax (419) 321-6430
Plaintiffs,	:	gcanestraro@ccw-law.com
v.	:	
	:	The Thomas More Society
CAPITAL CARE OF TOLEDO, LLC	:	A National Public Interest Law Firm
D/B/A CAPITAL CARE OF TOLEDO	:	309 W. Washington, Suite 1250
1160 W. Sylvania Ave.,	:	Chicago, IL 60606
Toledo, Ohio 43612	:	Tel. (312) 682 1780
	:	tolp@thomasmoresociety.org
&	:	
	:	
AMELIA STOWER,	:	Attorney for Plaintiffs
1160 W. Sylvania Ave.	:	
Toledo, Ohio 43612	:	
	:	
Defendants.	:	

I. INTRODUCTION

1. This action is brought in the name of the State of Ohio pursuant to Ohio Revised Code ("RC") 4731.341(B) and asks the Court to enjoin the Defendants from engaging in the practice of medicine without a license, which is prohibited by RC 4734.41, and from the

unauthorized practice of medicine as defined within RC 4731.34, RC 2919.11, and RC 2919.123.

2. RC 4731.34(A)(2) provides that a person shall be regarded as "practicing medicine" if the person "...Advertises, solicits, or represents in any way that the person is practicing medicine and surgery. . ." and RC 4731.41 identifies numerous actions or activities which are prohibited by anyone 'not licensed or certified by the state medical board'.

3. Defendant Capital Care of Toledo, LLC ("Capital Care"), directly and through its owner, co-Defendant Amelia Stower, advertises the sale of abortifacients (Abortion Pills) and related medical services to the public. In doing so, Capital Care "practices medicine" in Ohio since RC 2919.11 states: "...Abortion is the practice of medicine or surgery for the purposes of section 4731.41 of the Revised Code..."

4. However, neither Capital Care, a mere general purpose LLC, nor its owner Amelia Stower, holds a medical license and therefore neither is permitted by Ohio law to advertise the provision of medical services, including abortifacients (Abortion Pills) and related medical services. By doing so Defendants are violating Ohio law's prohibiting the practice of medicine without a license and are engaged in the unauthorized practice of medicine. This lawsuit seeks to enjoin these unlawful practices, which RC 4731.341(A) defines them to be "inimical to the public welfare and a public nuisance."

II. JURISDICTION

5. RC 4731.341(B) authorizes "the Franklin County Court of Common Pleas or any other court of competent jurisdiction" to hear an action brought "in the name of the state" by "any person having knowledge of a person who" is engaged in the "practice of medicine . . . not at that time holding a valid and current license or certificate as provided by Chapter 4723 [nurses], 4725 [optometrists], or 4731 [physicians] of the Revised Code. . . ." In such action

the court may "enjoin any person from engaging either directly or by complicity in the unlawful activity. . .".

6. When the petitioning party is a private group or citizen, RC 4731.341(B) does not provide for, nor require, an administrative review or hearing as a condition precedent to a knowledgeable "person's" extraordinary right, to wit: the filing of an injunction proceeding before a Common Pleas Court to stop the nuisance.

7. Of all the professional remedies against the various types of unauthorized practice, only the unauthorized practice of medicine has such broad and flexible jurisdictional remedies.

8. As explained below, RC 4731.341(B) provides two methods by which the public nuisance can be enjoined.

i. By the Ohio Medical Board acting on its own initiative or by complaint brought to it, in conjunction with the attorney general or the prosecutor. Under this method advance notice is required.

ii. As a public police action in the name of the State by another person with knowledge, requiring no advance notice.

9. RC 2919.11 (**Exhibit H**) states in part, "...Abortion is the practice of medicine or surgery for the purposes of section 4731.41 of the Revised Code..." thereby restricting the practice of abortion, and the advertised direct sale of abortion pills (RC 4731.34(A)(2), 4731.41(A), and RC 2919.123 (**Exhibit I**) to licensed and certified physicians.

10. Both surgical and non-surgical abortions conducted by a person who is not a licensed physician, or who advertises, solicits or represents in any way that the person is practicing medicine, or who through the use of any written, oral, or electronic communication prescribes, advises, recommends, administers, or dispenses for compensation ...a drug or medicine...for the cure or relief of an infirmity, constitutes practicing medicine

without a license and thereby also constitutes the unauthorized practice of medicine under RC 4731.34.

III. PARTIES

11. Plaintiffs, The State of Ohio, by and through: Right To Life Action Coalition of Ohio (hereinafter "RTLACO"), and Greater Toledo Area Right to Life (hereinafter "Toledo Right To Life") are non-profit associations existing under the laws of Ohio and are "persons" as described in RC 1.59.

12. Plaintiff Jeffrey Barefoot (hereinafter "Barefoot") is a resident of Wood County, Ohio and is Board Vice President of RTLACO and Board President of Toledo Right To Life. RTLACO, Toledo Right To Life and Barefoot are collectively referenced herein as "Plaintiffs."

13. Defendant Capital Care of Toledo, Ohio, LLC (hereinafter "Capital Care"), an Ohio general purpose limited liability company, with a physical location in Toledo, Ohio which advertises on its public website that it provides, for sale, abortion pills and medical services for residents of Northwest Ohio under the name "Capital Care of Toledo, Ohio".

14. Defendant, Amelia Stower (hereinafter "Stower"), is the sole owner and statutory agent of Capital Care. (See **Exhibits A, B & C** attached). She has never been issued a license of any kind allowing her to practice medicine in the State of Ohio (See **Exhibit D** attached) and on knowledge and belief, is a resident of Findlay, Hancock County, Ohio and an undergraduate college student at the University of Toledo, majoring in women's studies and nursing.

IV. FACTUAL ALLEGATIONS

*Stower Does Not Hold A Medical License
And Capital Care Is Not A Medical Professional LLC*

15. Capital Care is a for-profit, non-professional, any purpose limited liability company organized in July of 2019 under the laws of Ohio, including RC 1701.02 and 1701.03(A) (See **Exhibits A & C** attached).

16. Capital Care is no different than any other non-professional business such as a grocery store, body shop or plumbing contractor and its managing member, Amelia Stower has never been licensed to practice medicine and on information and belief holds no other professional licenses.

17. Presently (and when formed) agents of Capital Care represented to the Ohio Department of Health and the State Board of Pharmacy that Capital Care was a “women’s health clinic” and that it “will provide medical abortion only” thus representing and alerting both state agencies of the very public nuisance which this complaint seeks to address. (See **Exhibits G & B** attached)

18. Upon information and belief no licensed physician is a member/owner of Capital Care and Capital Care is not a professional corporation or professional association authorized to offer medical services under RC 4731.226 or RC 1701.03(B).

19. Upon information and belief, the independent contractor physician that is participating in, and assisting Capital Care, holds herself out to be either a sub-contractor or independent agent of Capital Care, and claims that she is self-employed (**Exhibit J** attached.)

20. As discussed in detail below under section VI of this Complaint, defendants Stower and/or Capital Care are performing the following prohibited activities that constitute the unauthorized practice of medicine and the practicing medicine without a license, thereby creating the public nuisance which this Court is being asked to prohibit, to wit:

1. Opening and conducting an office for the purpose of practicing abortion medicine, in violation of RC 4731.41(A);

2. Conducting an office to provide medical abortion to the general public in the “name of a person who has a license”, in violation of RC 4731.41(A);
3. Using the word “Doctor” (or ‘our Doctor’) in connection with its business, thus representing that Defendants are in the practice of medicine, in violation of RC 4731.34(A)(1);
4. Advertising, soliciting and representing in its public web site and Facebook postings that Capital Care is practicing medically induced abortion, in violation of RC 4731.34(A)(2);
5. Soliciting, by publicly encouraging potential ‘patients’ to schedule their first appointment through Defendants’ public website portal, in violation of RC 4731.34(A)(2);
6. For both direct and/or indirect compensation, offering to perform through “our staff” examinations and diagnostics and other medical services related to pregnancy gestation, in violation of RC 4731.34 (A)(3)(a) & (b);
7. Claiming to administer or dispense, for indirect or direct compensation, drugs and medicine for the cure of an infirmity, in violation of RC 4731.34(A)(3)(b);
8. Using words and titles in advertising to the general public that under circumstances induces the belief that Capital Care is in the practice of abortion medicine, in violation of RC 4731.34(A)(1) and RC 2919.11.

V. ISSUES OF LAW

A. Primary Statutory Provisions.

21. “Persons” for the purpose of this action includes an individual, corporation, business, trust, estate, partnership and association, ORC 1.59 (C). “The state” means the state of Ohio, ORC 1.59 (G). All the parties to this complaint are persons or states.

22. Title 47 of the Ohio Revised Code governs all Occupations and Professions in Ohio. Chapter 4731 specifically applies to Physicians. Contained within Chapter 4731 are two sections: RC 4731.34, which prohibits unauthorized practice of medicine; and RC 4731.41, which prohibits practicing medicine without a license.

23. RC 4731.34(A) provides that a person is involved in the unauthorized practice of medicine who does any of the following:

(1) Uses the words or letters, "Dr.," "Doctor," "M.D.," "physician," "D.O.," "D.P.M.," or any other title in connection with the person's name in any way that represents the person as engaged in the practice of medicine and surgery, osteopathic medicine and surgery, or podiatric medicine and surgery, in any of its branches; or

(2) Advertises, solicits, or represents in any way that the person is practicing medicine and surgery, osteopathic medicine and surgery, or podiatric medicine and surgery, in any of its branches; or

(3) In person or regardless of the person's location, through the use of any communication, including oral, written, or electronic communication, does any of the following:

(a) Examines or diagnoses for compensation of any kind, direct or indirect;

(b) Prescribes, advises, recommends, administers, or dispenses for compensation of any kind, direct or indirect, a drug or medicine, appliance, mold or cast, application, operation, or treatment, of whatever nature, for the cure or relief of a wound, fracture or bodily injury, infirmity, or disease.

24. Further, under RC 4731.34(C) a person is practicing unauthorized medicine who

The use of words, letters, or titles in any connection or under any circumstances as to induce the belief that the person who uses them is engaged in the practice of medicine and surgery, osteopathic medicine and surgery, or podiatric medicine and surgery, in any of its branches, is prima-facie evidence of the intent of such person to represent the person as engaged in the practice of medicine and surgery, osteopathic medicine and surgery, or podiatric medicine and surgery, in any of its branches.

The unauthorized practice section was effective in 2001.

25. Additionally, practicing medicine without a license or certificate is defined and prohibited separately within RC 4731.41 (A). The definition was enacted in 1999. It prohibits the practice of medicine without a license, listing specific types of prohibited conduct, to wit:

- Advertising or claiming to the public to be a Practitioner of medicine...[who is] without a license or certificate from the board.
- Opening and conducting an office for the practice of medicine without a license.
- Conducting an office in the name of a person who has a medical license.

26. RC 2919.11 defines abortion as the "practice of medicine" and does not distinguish between surgical or non-surgical abortion. Dispensing abortion pills and related services

(sometimes hereinafter referred to as "abortion medicine") is non-surgical abortion.

27. RC 2919.11 (**Exhibit H**) became effective in 1974, preceding by more than 25 years both the RC's unauthorized practice section (effective in 2001) and the RC practicing without a license section (effective in 1999).

28. The enjoining of the unauthorized practice of medicine and practicing medicine without a license, which includes practicing *abortion* medicine without a license, is authorized by RC 4731.341.

29. RC 4731.341 (A) applies to any person not holding a license including:

- (1) the practice of medicine in all its branches; and,
- (2) the treatment of human ailments without drugs or operative surgery.

30. Thus, the practice of abortion medicine without a license, i.e. in any unauthorized form, is legislatively deemed to be "inimical to the public welfare" and a public nuisance. RC 4731.341(A).

31. The common definition of "inimical" means being adverse often by reason of hostility and malevolence. The alleged actions of the Defendants, that is to say their unauthorized practice of abortion medicine, endanger the public health and welfare and are inimical to it, thus constituting a public nuisance.

32. To stop the public nuisance identified herein, RC 4731.34(B) authorizes *any person* in the name of the State (separate from either the Attorney General, the Ohio Medical Board or the County Prosecutor where the offense occurs) to apply for an injunction in either the Franklin County Court of Common Pleas or "any other Court of competent jurisdiction".

33. This direct application to the court in no way requires the "person" to subordinate his or her right for direct action to the Ohio Medical Board and it specifically does not require any administrative hearings under RC 119.

34. A contrary interpretation, i.e. to require Ohio Medical Board notification before the 'person' can bring injunctive relief, would circumvent RC 4731.34(B)'s express authorization that "any person" may apply for injunctive relief in any court of competent jurisdiction to enjoin the public nuisance inimical to the public welfare described therein, and in this Complaint.

35. Additionally, RC 2919.123 makes it unlawful for a person knowingly to give, sell, dispense, administer or otherwise provide or prescribe RU-486 (Mifepristone, also known by its trade name 'Mifeprex', which is the abortion-inducing drug used in abortion medicine advertised, promoted and available for purchase through the Defendants) to another for the purpose of inducing an abortion in any person or enabling the other person to induce an abortion in any person, unless the person giving, selling, dispensing, administering or prescribing RU-486 (Mifepristone) is a physician satisfying all of the established criteria created by federal law governing abortifacient drugs.

36. It follows that Defendants' activities to advertise their ability to sell abortion drugs directly to the public for a fixed fee and from a fixed Ohio business location, when the Defendants are not permitted to independently purchase, prescribe and distribute abortifacients, constitutes the practice of medicine without a license and the unauthorized practice of medicine in Ohio, and is prohibited by the Ohio statutes identified above.

B. Secondary Statutory Provisions.

37. RC 4731.226, titled: "Offering of services through authorized business entities" clearly lists what forms of the practice of medicine (other than a sole practitioner) are authorized and therefore, by implication, what are not authorized.

38. RC 4731.226(A)(1) states, in part:

An individual whom the state medical board licenses, certifies, or otherwise legally authorizes to engage in the practice of medicine and surgery, osteopathic medicine and surgery, or podiatric medicine and surgery may render the professional services of a doctor of medicine and surgery, osteopathic medicine and surgery, or podiatric medicine and surgery within this state through a corporation formed under division (B) of section 1701.03 of the Revised Code.

39. A sharp distinction must be made between the professional entities of RC 1701.03 (B) and the so-called “any purpose” for-profit entities of RC 1701.03 (A).

40. Medical services may not be delivered through an “any purpose” for-profit corporation, partnership, or LLC, but only through authorized professional entities formed as an individual or group practice.

41. The Ohio Revised Code’s controlling limitation is that an established “any purpose” for-profit corporation formed under RC 1701.03(A) and owned by a non-licensed person may not lawfully hire and employ a physician. Such an entity may not lawfully offer medical services. It may not lawfully make a profit from a doctor’s services.

42. Reinforcing this principle is that RC 1785.02 requires that all members of Registered Ohio Professional Medical Associations (“Professional LLC’s”) must have the same professional licenses. RC 1785.03 requires that a professional association may render medical services only through its duly licensed professionals.

VI. ADDITIONAL ALLEGATIONS

43. Capital Care, through its *advertising* offers, for a fee, medical advice and medical services concerning pregnancy, pregnancy testing and related diagnostic procedures, including offering the direct sale of medical abortion medication (“abortion pills”), and related and follow-up medical services. (See **Exhibit F** attached hereto).

44. Medication abortion, also known as abortion with pills, is a pregnancy termination protocol that typically involves taking two different drugs, Mifepristone and Misoprostol,

used up to the first 70 days (10 weeks) of pregnancy.

45. According to the records of the Ohio Secretary of State, the Ohio State Medical Board and the Ohio Department of Health, Capital Care does not operate as a for-profit or a non-profit Hospital under RC 3701.01(C) or (E), or as a Public Health Center under RC 3701.01(D), or as a Medical Facility under ORC 3701.01(F), or as an Ambulatory Surgical Facility pursuant to ORC 3702.30, or as a Health Care Facility under ORC 3702.30.

46. The existing on-line public records of the Ohio State Medical Board indicate that Stower is not, and never has been, a licensed medical doctor/physician, a registered nurse, or a licensed pharmacist. See **Exhibit D** hereto.

47. Nevertheless, Stower, as sole owner/operator of Capital Care since approximately September of 2020, is operating a self-described '*women's medical clinic*' (see **Exhibit E**, p. 9) which acquired a Terminal Distributor of Dangerous Drug License in 2019 (again, see **Exhibit E**, p. 1) from the Ohio State Board of Pharmacy, completely outside the purview and regulation of the Ohio State Medical Board, the Ohio Department of Health or the U.S. Food and Drug Administration.

48. Because the U.S. Food and Drug Administration ("FDA") has applied a Risk Evaluation and Mitigation Strategy (REMS) for Mifeprex (Mifepristone) since 2011, this (abortion) drug cannot be independently dispensed by either of the Defendants herein [See 21 C.F.R. § 314.520 (2000) and, See 21 U.S.C. § 355-1.]; and it cannot legally be acquired in the U.S. over the internet. Mifepristone cannot be dispensed by retail pharmacies like most other medications. Pregnant patients can legally obtain the drug only directly from a certified medical provider who has completed a manufacturer's prescriber agreement regarding proper use of the drug. 21 C.F.R. § 314.520 (2000).

49. Thus, Mifeprex (Abortion Pills) can be dispensed only by a healthcare professional

who is knowledgeable and able to provide the patient with proper instructions regarding the appropriate use of the drug, including the potential side effects that may occur in the patients' circumstances or follow-up that may be required as appropriate, and who will answer any questions the patient may have.

50. Capital Care opened its offices in July 2019 for the purpose of inducing abortions and both defendants are conducting an office at 1160 W. Sylvania, Ave., Toledo, OH 43612 for the purpose of practicing abortion medicine through the means of the advertised sale and distribution of abortion medication - in violation of numerous federal and state statutes, including RC 4731.41.

51. Defendants' website clearly references the services of "our Doctor" (**Exhibit F**) who remains an unidentified non-owner physician, violates RC 4731.41 in that defendants are conducting an office in the "name of a person who has a license" [see RC 4731.41(A)]

52. Capital Care's website, in violation of 4731.34 (A) (2), advertises its medical services with the following statements:

1. Yes, We Have Abortion Pills - Call us at 419.478.6801.
2. Abortion Pills - \$575 - \$625.
3. We are committed to providing this vital service and we are taking all steps to keep *our patients* safe and healthy. (*emphasis added*)
4. These pills are a safe and effective way to end a pregnancy. You can expect to have bleeding, cramping and flu symptoms during your medical abortion.
5. Your first visit includes ultrasound, lab samples, and consultation with *our doctor*, so expect your visit to last 3-5 hours. (*emphasis added*)

See <https://www.capitalcarenetwork.com/> (last visited 2/17/21). See **Exhibit F**, attached hereto.

53. Further, on its Facebook postings, Capital Care states:

If you need abortion care, we are still open and providing safe, professional care. Patients health and safety come first. We can assure you that the staff in this building are taking every precaution....

and

We are open and proudly providing medical abortions to folks in NWO.

54. Defendants, as a result of the above advertising, are also soliciting by publicly encouraging potential patients to schedule their first appointment through the public web site portal in violation of 4731.34 (A) (2).

55. Defendants by posting their fees and payment schedule are publicly showing they are performing this practice without a doctor's license for direct and /or indirect compensation, violation of 4731.34 (A) (3) (a).

56. Defendants use the word "doctor" not once, but twice, on their website as follows"

1. "Your first visit includes ultrasound, lab samples, and consultation with *our doctor*, so expect your visit to last 3-5 hours" .

2. "During your in-office consultation our staff will use ultrasound to determine the gestational age of your pregnancy *and our doctor* will review your options with you" . (**Exhibit F**)

Thus, Defendants are using the word "Doctor" in connection with its business to make it appear as though they (Defendants) are in the practice of medicine in violation of 4731.34 (A) (1).

57. In addition, Capital Care in an email to the Ohio Department of Health and documents sent to the Ohio Board of Pharmacy referred to itself as a "women's medical clinic" See **Exhibits G, B and E**) Moreover, the Capital Care web-site intentionally uses claims and offers which, under these circumstances, induces the belief that Capital Care is in the practice of abortion medicine" - in violation of RC 4731.34 and RC 4731.41.

58. Advertising the administration, for compensation, of a drug or medicine for the cure

or relief of a wound, fracture or bodily injury, infirmity, or disease is part of the practice of medicine, as defined in R.C. 4731.34, and the practice of medicine may not be delegated by a licensed physician to a person who is not authorized by statute to administer a drug or medicine. (1917 Op. Att'y Gen. No. 528, vol. II, p. 1497; 1911-1912 Op. Att'y Gen. No. E 222, vol. I, p. 876, approved and followed.)

VII. CAUSES OF ACTION

First Cause Of Action: Unauthorized Practice of Medicine

59. Plaintiffs reallege and incorporate by reference each and every allegation contained in Paragraphs 1-58 above as though fully set forth herein .

60. Wherefore, Defendants are engaged in the Unauthorized Practice of Medicine under ORC 4731.34.

Second Cause of Action: Practicing Medicine Without a License

61. Plaintiffs reallege and incorporate by reference each and every allegation contained in Paragraphs 1-58 above as though fully set forth herein.

62. Wherefore, Defendants are Practicing Medicine Without a License under ORC 4731.41.

REQUEST FOR EXTRAORDINARY RELIEF – PER RC 4731.341

63. Both of the above identified causes of action are inimical to the public welfare and constitute a public nuisance. Unless Defendants are permanently enjoined from the action and numerous activities identified herein, they will continue to practice medicine without a license and cause damage and injury to the State of Ohio under which this request for injunction is brought.

64. Because Defendant' practice of medicine without a license violates RC 4731 Plaintiffs are also entitled to seek damages and to recover their attorneys' fees in bringing this

action in the name of the State of Ohio on behalf of the general public.

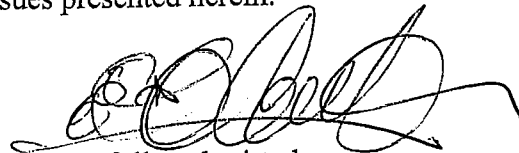
WHEREFORE, plaintiffs request injunctive relief and judgment against defendants, and each of them, as follows:

- A. The unauthorized practice of medicine in the State of Ohio.
- B. Advertise anywhere in the State of Ohio, using any means including radio, television, print, Internet, or social media that it provides abortion services in any form, surgical or medical.
- C. Soliciting appointments for abortions in any form.
- D. Use any communication, oral, written, electronic, including web sites, digital texts, for examinations or diagnostic of gestation of pregnancy, examination of body fluids, of referring to any persons as "patients" or providing the services of "our Doctor".
- E. Conduct an office or any other place of business for the practice of medicine including medical abortion services unless the Defendant Amelia Stower first provides proof to the court of holding a valid medical or osteopathic license.
- F. Conduct an office in the name of some person who has a license or certificate to practice medicine.
- G. Render any professional medical services medical or medical abortion services in combination with any licensed medical professional or professional association under 1785.03
- H. For reasonable attorneys' fees incurred necessary to abate the nuisance and costs and for such other and further relief as this court deems just and proper.

DECLARATORY RELIEF

Should this Court determine extraordinary Injunctive Relief is not in order, Plaintiffs petition the Court find a justiciable controversy and issues of fact and law exists as presented, which permits and/or requires this court to rule on the claims presented pursuant to the Court's inherent Declaratory Judgment powers identified within RC 2721. et. seq., As such, Plaintiff request Declaratory Relief on the issues presented herein.

Dated: March 2, 2021



Respectfully submitted,

/s/ Eugene F. Canestraro, Esq.
Eugene F. Canestraro, Esq. (0025158)
Cline, Cook & Weisenburger Co., LPA
405 Madison Ave., Suite 1100
Toledo, Ohio 43604
Tel. (419) 321-6444
Fax (419) 321-6430
gcanestraro@ccw-law.com

The Thomas More Society
A National Public Interest Law Firm
309 W. Washington, Suite 1250
Chicago, IL 60606
Tel. (312) 682 1780

Attorney for Plaintiffs

VERIFICATION

I, Jeffery Barefoot, a Plaintiff herein, have read and reviewed this Complaint requesting Injunctive Relief and Damages, and after having done so, believe the information contained therein is true and correct to the best of my knowledge and belief.

Date: _____

Jeffery Barefoot

Eugene F. Canestraro, Esq. (0025158)
Cline, Cook & Weisenburger Co., LPA
405 Madison Ave., Suite 1100
Toledo, Ohio 43604
Tel. (419) 321-6444
Fax (419) 321-6430
gcanestraro@ccw-law.com

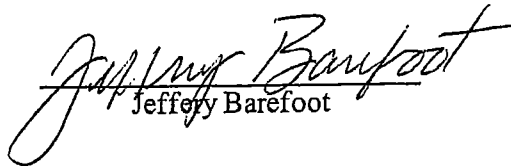
The Thomas More Society
A National Public Interest Law Firm
309 W. Washington, Suite 1250
Chicago, IL 60606
Tel. (312) 682 1780

Attorney for Plaintiffs

VERIFICATION

I, Jeffery Barefoot, a Plaintiff herein, have read and reviewed this Complaint requesting Injunctive Relief and Damages, and after having done so, believe the information contained therein is true and correct to the best of my knowledge and belief.

Date: MARCH 2, 2021


Jeffery Barefoot