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RN 2@9&! %&(9A?\$'%9&! \$&G! O<#%<(I! B<(<&G\$&'! S\$&<==\$! Q99G?\$&! 78 6 =N! Q99G?\$&:;!%=!\$!C%'%T<&!9(!Q<9AH%\$!\$&G!\$!A<=%G<&'!9(!)9CUG\$#<!/9F&'DI!Q<9AH%\$!\$&G! ?\$D!O<!@<A=9&\$##D!=<AP<G!\$'!RVWX!)<(#<C'%9&!/A<<U!BAI!/9&D<A=I!Q<9AH%\$!YVVMYN! 6 =N!Q99G?\$&!%=!=FOZ<C'! aN +>%=! / 9FA'!%=!(FA'><A!\$F'>9A%T<G!'9!<c<AC%=<!ZFA%=G%C'%9&!\$&G!HA\$&'!'><! G<C#\$A\$'9AD!A<#%<(!=9FH>'!><A<%&!O<C\$F=<I!!''#\$%&'(!'L!

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 $j <\!\!G$, $c !\!G <\!\!\#\BP <\!\!AD!\B=!$

$\texttt{MWN} \qquad \texttt{``&! } j < \texttt{OAF} \texttt{``AD! } \texttt{RaI! } \texttt{RVRWI!}$

8BN:;!

 $70!' \texttt{AF} < !\ \texttt{AG} : C9\texttt{AA} < C' ! C9\texttt{@D} ! 9(!' > <! j < \texttt{G}, c ! C9\texttt{@(\texttt{MA} ? \texttt{M9}\texttt{A}!\texttt{M}=!\texttt{S}''\texttt{C} > <\texttt{G}! > <\texttt{A} <'9!\texttt{S}=!, c > \texttt{MO}\texttt{M}'!$

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	86K"2=7= J "1 J 76LB@""	"
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" " - " \$ -)	!50!#;!R#" !	!
01&22-")""-'\$-]	!50!#;!R#"	"
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3 - 4 & 5 - " - 3) ! /	M:L6N:C8:" !	"
2 # \$ % # (& ' () ! 6 2 -)	S:N/U"/CV:9KW:" !	"
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MbN 1@<C%(%C\$##DI!C9F&=<#!(9A!B<(<&G\$&'! ^ \$G<!A<@A<=<&'<G!'>\$'!81Gm<=@%'<! @A9P%G%&H!)99'!K%'>!?F#'%@#<!9@'%9&=!OD!K>%C>!'9!G<#%P<A!'><!@\$D?<&'I!)99'!>\$1Gm! &9'!G<#%P<A<G!\$&D!@\$D?<&'!K>\$'=9<P<A!\$&G!'><A<(9A<!)99'!A<Z<C'<G!"#\$%&'%((n=! A<\$=9&\$O#<!9((<AN:!)\$\$!.8N!\$'!YN!

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MXN / 9F&=<#!(9A!B<(<&G\$&'! ^ \$G<!(FA'><A!\$GP%=<G!'>\$'!\$!@9'<&'%\$#!ZFGH ? <&'! %&!<cC<==!9(!'><!
$$\begin{split} M] \mathbb{N} & O('<A! O< \& H! C9\&(A9\&'<G! K\%'>! '><! j<G, c! G< \# P< AD! C9\&(\%A ? $'\%9\&! \& G! @>9'9HA\& @>!A<(<A< & C<G! & O< P< I|C9F& =< \#!(9A!B<(<&G\& & '! ^ $G<!&GP\% =< G!'>$'!><!O< \# & P<G! '><! 1<''#< ?<&'! /><CU! '>$'! K$ =! & G ? \''<G#D! G< \# P<A<G! $=! C9\&(\%A ? <G! OD! j<G, c! K$ =! =FO =< gF<& '#D! = '9#<&!OD!8@9AC>!@%A$'<=N: !O !'AF<!& G!C9AA<C'!C9@D!9(!'><! 6 & AC>!MW!& G! MbI!RVRWI!< ? & ##!C>& & C9&(\%A ? \%& H!C9F& =< #!(9A!B<(<&G\& '! ^ & G<e =!A<@A< =< & '$'\%9& =!\% =! $''`& C><G!><A<'9!$'!, c>%O%'!8 j N: !$$

RVN 4&!=F@@9A'!9(!

(FA'><A!\$GP%=<G!'>\$'!><!G%G!&9'!=<<! ?FC>!F=<!%&!A<@9A'%&H!'><! ?\$''<A!'9!#9C\$#!#\$K! <&(9AC< ?<&'N!!.8N!

 $\label{eq:RRN} OCC9AG\%\&H\#DI!'><A<!\%=!\&9!G\%=@F'<!><A<\%\&!'>\$'!'><!1<''\#<?<\&'!/><CU!K\$=!\\G<\#\%P<A<G!'9!'><!\$GGA<==!=@<C\%(\%<G!\%\&!'><!7*(\#!B<?$\&GN!)$

$$\begin{split} & \text{RYN} \qquad 2 \ @9\&!C9F\&=<\#!(9A! ^ $G<e=!A<@A<=<\&'$'\$9\&!'>\$'!'><!9A\$H\$\&\$\#!@\$D?<\&'!>\$G! \\ & O<<\&!='9\#<\&I!) 99'!\$? ? <G \$\$'<\#D!@\#\$C<G!\$!B='9@`@\$D: !9\&!'><!9A\$H\$\&\$\#!C><CUI!\&G!(FA'><A! \\ & A<gF<='<G!'>\$'!9F'=\$G<!C9F&=<\#!A<'\$\&&<G!'9!\$CC<@'!'><!7 *(\#!B<? \&G!A<@9A'!'><!@CUH<! \\ &='9\#<\&!K\$'>! j < G, cN! \end{split}$$

RWN * &! 6 \$AC>!RR

 $Ra \mathbb{N} = 99'! \mathbb{A} < @<\$'=!\$ & G! \mathbb{A} < \$\# < H <= !'> <! (9 \mathbb{A} < H9 \mathbb{A} & H1 @ \$ \mathbb{A} & HA \\ \$ @>=!\$ =! \mathbb{A} (!(F \# D! = <'!(9 \mathbb{A} '> ! \mathbb{A}) = 1)$

><A<%&N!

 $\label{eq:RXN} RXN) 99'!(F \# D! \& G! F \& < g F P 9 C \# D! C < @' < G!' > <! 7 * (#!) \\$

Case 1:24-cv-01254-ELR Document 1 Filed 03/22/24 Page 13 of 17

C9&'A\$C'!K\$=!CA<\$'<GN!

 $Y[\mathbb{N} + F=I!B<(<\&G\&V! ^ G<! ?F='!\&9K!@A9P\&G<!'9!) 99'!\&&G! 6=\mathbb{N}!Q99G?\&! '><!<c<CF'<G!$

WWN B9%&H! =9! K%##! A<&G<A! \$&D! =F0=<gF<&'! #%'%H\$'%9&! OD! B<(<&G\$&'! ^ \$G<! \$H\$%&='! 6 =N!Q99G ? \$&! ? 99'N!

 WbN
 +><!=<''#<?<&'!C9&'A\$C'!%=!(\$%AI!ZF='I!\$&G!&9'!\$H\$%&='!H99G!C9&=C%<&C<I!</td>

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WaN)99'!'><A<(9A<!\$GG%'%9&\$##D! =<<U=! \$&! 9AG<A! (9A! =@<C%(%C! @<A(9A ? \$&C<! A<gF%A%&H!B<(<&G\$&'! ^ \$G<!'9!>9&9A!'><!=<''#< ? <&'!C9&'A\$C'!\$=!<&'<A<G!%&'9!OD!'><! @\$A'%<=I!'9!%&C#FG<!<c<CF'%9&!9(!'><!A<#<\$=<!=@<C%(%<G!%&!'><!7*(9&095000.2412.2457589.9143&22

(N! j %&G!\$&G!G<C#\$A<!'>\$'!B<(<&G\$&'! ^ \$G<!0A<\$C><G!'><!=<''#< ? <&'!C9&'A\$C'!><! <&'<A<G!%&'9!K%'>!) 99'!0D!(\$%#%&H!'9!<((<C'F\$'<!'><!=<''#<?<&'!'<A?=f!! &N! * AG<A!=@<C%(%C!@<A(9A ? \$&C<!9(!'><!=<''#< ? <&'!C9&'A\$C'I!%&C#FG%&H!OF'!&9'! #\$\!\`\CG!'9I!'><!(9##9K\\&H!GF'\\<=!9(!B<(<&G\\&'! ^ \G<!\\$=!=<'!(9A'>!\\&!'><!7*(#! **B**<?\$&GL!

- 4&!<cC>\$&H<!(9A!=<''#<?<&'!(F&G=!%&!'><!B<?\$&G<G!0?9F&'I!6AN!^\$G<! K\##!=\H&!\$&G!<c<CF'<!\$!C9@D!9(!'><!#\?\'<G!A<#<\$=<!\$''\$C><G!\$=!,c>\\O\'! W! '9! '><! _9#'! G< ? \$&G! \$&G! @A9P%G<! \$&! <c<CF'<G! C9@D! 9(! '>\$'! #% ? %'<G! A<#<\$=<! '9!)99'! \$&Gk9A! 9'><A! @<9@#<! \$&G! <&'\'\'\<=! \$=I! A<\$=9&\$O#D! A < gF <= ' < Gf! & G!!
- 3%<&=I!=F0A9H\$'%9&I!\$&G!A<% ? OFA=< ? <&'!K\###!0<!>\$&G#<G!\$=!=<'!(9A'>!\&! • '><!A<#<\$=<!A<(<AA<G!'9!%&!'><!@A<C<G%&H!@\$A\$HA\$@>f!

. N!QA\$&'!'9!)99'!(<<=!\$&G!<c@<&=<=!9(!#%'%H\$'%9&!@FA=F\$&'!'9!*N/NQNON!\\!MY` a`MMI!RY`R`b[!\$&Gk9A!bM`MR`Xf! / N!QA\$&'!) 99'!\$&D!\$&G!\$##!(FA'><A!A<#%<(!'>\$'!'>%=!/9FA'!?\$D!G<<?!<gF%'\$O#<!

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%N!QA\$&'!)99'!\$!'A%\$#!OD!ZFADN!!) <=@<C'(F##D!=FO ? %''<G!'>%=!RR^{CN}!G\$D!9(! 6 \$AC>I!RVRWN!

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J A%\$&!) N!1 ? %'>! Q\$N! J \$A!59NL!VVMYVR! <##*%''\$4&=*%&>('!''#!==&; **#&.''/+%'''0\$& 1*23'''4& !

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