

IN THE UNITED STATES DISTRICT COURT
 FOR THE SOUTHERN DISTRICT OF TEXAS
 HOUSTON DIVISION

KAREN RODRIGUEZ, and CELIA §
 RODRIGUEZ, INDIVIDUALLY AND ON §
 BEHALF OF HER MINOR CHILDREN, §
 REBECCA AND KIMBERLY §
 RODRIGUEZ, §
Plaintiffs §

CIVIL ACTION NO. 4:17-cv-1854

v. §

JEFFERSON B. SESSIONS III, §
 ATTORNEY GENERAL OF THE §
 UNITED STATES, JOHN F. KELLY, §
 SECRETARY OF THE DEPARTMENT §
 OF HOMELAND SECURITY, §
 DIRECTOR, UNITED STATES §
 CITIZENSHIP AND IMMIGRATION §
 SERVICE, and IMMIGRATION AND §
 CUSTOM ENFORCEMENT, §
Defendants §

**VERIFIED COMPLAINT FOR DECLARATORY JUDGMENT AND
 INJUNCTIVE RELIEF**

NATURE OF THE ACTION

This action is a challenge brought by four United States citizens, the three children and wife of an immigrant, whose immigration visa application as a U.S. citizen's immigrant spouse, is in the midst of the approval process but who is unjustifiably scheduled to be deported on June 29, 2017. The children and their mother seek to vindicate their constitutionality protected right to fully exercise their religion and to enjoin their father-husband's imminent deportation by federal immigration authorities. The Rodriguez family practices a religious belief in the paramount union of marriage and family, which is substantially burdened by the federal immigration authorities' decision to deport. The immigration authorities' regulations and practices violate the Plaintiffs'

constitutional rights to fully live and express their religious faith, their right to remain in the country of their citizenship, their inherent right to family unity, their right not to be thrown into a state of poverty and constant danger, and their right for substantive and procedural due process.

The Plaintiffs request that the prosecutorial discretion of Defendants not be undertaken without consideration of the rights and interests of the children and their mother.

JURISDICTION AND VENUE

1. The Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1331 and § 1361 and 42 U.S.C. § 2000bb-1. This action arises under the Constitution and laws of the United States. This Court has jurisdiction to render declaratory and injunctive relief under 28 U.S.C. §§ 1651 (a), 2201 and 2202.

2. Venue lies in this district pursuant to 28 U.S.C. § 1391(e). Plaintiffs reside in this district. A substantial part of the events or omissions giving rise to the claim occurred or will occur in this district.

PARTIES

3. Plaintiff Karen Rodriguez is an 18 year old very recent high school graduate. Karen is a United States Citizen.

4. Plaintiff Rebecca Rodriguez is 15 years old and Plaintiff Kimberly Rodriguez is 10 years old. Both are minor children. Rebecca and Kimberly Rodriguez were born and lived their entire lives in the United States of America.

5. All three children Plaintiffs reside in Houston, Texas with their father, Juan Rodriguez and their Mother, Celia Rodriguez.

6. Celia Rodriguez is a United States Citizen and mother of all three Plaintiffs. She brings suit individually and as next friend on behalf of her minor children, Rebecca and Kimberly Rodriguez.

7. Defendants are appointed officials of the United States government and United States governmental agencies responsible for issuing the Order of Deportation and enacting the policies and regulations at issue.

8. Defendant Jefferson B. Sessions III is the Attorney General of the United States ("AG"). In this capacity, he has responsibility for the operation and management of the Department of Justice. General Sessions is sued in his official capacity only.

9. Defendant Department of Homeland Security ("Homeland Security") is an executive agency of the United States government and is responsible for the promulgation, administration and enforcement of the Order of Deportation.

10. Defendant John F. Kelly is the Secretary of the United States Department of Homeland Security. In this capacity, he has responsibility for the operation and management of the Department of Homeland Security. Secretary Kelly is sued in his official capacity only.

11. Defendant United States Citizenship and Immigration Services ("USCIS") is an executive agency of the United States government within the Department of Homeland Security and is responsible for the promulgation, administration, and enforcement of the Order of Deportation and will have responsibility for adjudication of any waivers that must be obtained before the American consular officers can issue an immigrant visa to Juan Rodriguez.

12. Defendant United States Immigration and Customs Enforcement (“ICE”) is an executive agency of the United States government within the Department of Homeland Security and is responsible for the promulgation, administration, and enforcement of the Order of Deportation.

13. Pursuant to Federal Rule of Civil Procedure 4(i), a copy of the summons and the Complaint are delivered to the United States Attorney for the Southern District of Texas and a copy is provided by certified mail to the office of the Attorney General of the United States in Washington, D.C.

FACTUAL ALLEGATIONS

PERSONAL FAMILY HISTORY

14. Celia Rodriguez and Juan Rodriguez are married with three children, two of which are minor children. They live in Houston, Texas where they have resided for almost twenty years.

15. All three girls are United States citizens and two are minors, not yet the age of majority.

16. Celia Rodriguez is a naturalized citizen of the United States.

17. Juan Rodriguez was born in El Salvador and desires to become a citizen of the United States. He entered the United States on July 3, 2001 seeking work. In the years since then, his story personifies the “American dream.” He has been a law abiding member of the community. Through hard work, dedication, and a life rooted in his Christian faith, Juan Rodriguez has built a life in the United States. He and his wife, Celia, have worked hard and obeyed the law, and raise three daughters in their otherwise idyllic family. Life has not been easy but over time, he has developed the trade and skill as a highly valued auto mechanic in Houston, Texas. Juan is a valuable

employee to his employer. Armed with a work visa, Juan Rodriguez fully reports his wages and income on his federal income tax returns, pays his taxes, and contributes to the community. At the moment, he is the sole financial provider for the Rodriguez family.

18. The Rodriguez family enjoys a very close relationship. The children, indeed, the entire family, are dependent on Juan Rodriguez for financial support, parental guidance, stability, and protection. Each of the daughters enjoys a unique and distinct relationship with each of their parents, including their father.

19. Juan Rodriguez is the spiritual leader of the family, often leading the family in their biblical studies. Their home has many Bibles strategically placed throughout to encourage frequent and lingering devotion. The children naturally look to their father in much the same way as the Bible proposes should be the role of the head of household. In fact, they look to Juan Rodriguez as their very own biblical Joseph, assuming his role as the leader to see that their family unit is protected.

20. This role is consistent with the family's practice of their Christian faith. They practice the Protestant Christian religious faith known as the Seventh Day Adventist Church. Seventh Day Adventism follows 28 "Fundamental Beliefs."¹ These are the fundamental tenets of its faith. According to its teachings, "*Seventh-day Adventist beliefs are meant to permeate your whole life.*"² Followers thus practice their religion as Christians of the Seventh Day Adventist denomination by embracing each tenet and belief and live their "whole life" accordingly. In particular, Belief no. 23 of the

¹ 28 *Fundamental Beliefs*, GEN. CONF. SEVENTH-DAY ADVENTIST CHURCH 10 (2015), <https://www.adventist.org/fileadmin/adventist.org/files/articles/official-statements/28Beliefs-Web.pdf>

² *Our Beliefs*, <https://www.adventist.org/en/>

Seventh-day Adventist doctrine is denominated as "Marriage and Family." It provides, in pertinent part, as follows:

*Marriage was divinely established in Eden and affirmed by Jesus to be a lifelong union between a man and a woman in loving companionship. For the Christian a marriage commitment to God as well as to the spouse should be entered into only between a man and a woman who share a common faith. God blesses the family and intends that its members shall assist each other toward complete maturity. **Increasing family closeness is one of the earmarks of the final gospel message.** Parents are to bring up their children to love and obey the Lord. By their example and their words they are to teach them that Christ is a loving, tender, and caring guide who wants them to become members of His body, the family of God which embraces both single and married persons.*³

21. The doctrine teaches that "[m]utual love, honor, respect, and responsibility are the fabric of this [marriage] relationship, which is to reflect the love, sanctity, closeness, and permanence of the relationship between Christ and His church."⁴ According to Adventist belief, God blesses the family and intends that its members shall assist each other toward complete maturity. *Increasing family closeness is one of the earmarks of the final gospel message.* Parents are to bring up their children to love and obey the Lord." (Emphasis added).⁵

22. The Rodriguez family has been members of the Pasadena Spanish Seventh Day Adventist church in Pasadena, Texas for many years where Mr. Rodriguez is considered a "valuable deacon" and his wife a teacher in the Children's Ministry department. As devout Adventists, among the various tenets from Adventism that they

³ 28 *Fundamental Beliefs*, GEN. CONF. SEVENTH-DAY ADVENTIST CHURCH 10 (2015), Belief 23, <https://www.adventist.org/fileadmin/adventist.org/files/articles/official-statements/28Beliefs-Web.pdf> (emphasis supplied.)

⁴ *Our Beliefs*, <http://www.adventist.org/en/beliefs/living/marriage-and-the-family/> (emphasis added).

⁵Id. (emphasis added).

have chosen to live, they fully observe the Sabbath⁶ from sundown on Friday to sundown on Saturday, devoting the entire day⁷ to re-connecting with their family and ministering to others.

23. Mr. and Mrs. Rodriguez actively form the lives of their children as they live their Adventist faith. Similarly, as dutiful children in the Rodriguez family, the children wish to fully express those religious beliefs as they grow toward complete maturity. They love and appreciate their parents. In fact, they depend on their parents to guide them toward complete Christian maturity. Their religious faith teaches them that their parents, both mother and father, represent God's ideal symbol of security and love. Like all children, they wish to continue to live with their parents as they have throughout their lives to learn within their family unit from their direct, personal example as loving, tender, and caring guides. Celia Rodriguez similarly desires to live her "divinely established" and "lifelong union" with her husband.

24. President Donald J. Trump campaigned on the notion that if elected, he would deport the "bad hombres," undocumented immigrants who had committed serious and violent crimes while in the U.S.⁸ As a nation, we certainly do not want or need criminals to migrate into the U.S.; instead, most Americans would prefer that good men, employed with stable and productive jobs, unite with their family, and raise a close and wholesome family in the United States. Mr. Rodriguez is anything but the "bad hombres"

⁶ *Fundamental Beliefs*, Id., GEN. CONF. SEVENTH-DAY ADVENTIST CHURCH 10 (2015), Belief 18.

⁷ This observance is similar to the practice of the Jewish faith wherein the Sabbath is considered to be a gift from God and intended to be devoted to family. <http://www.religionfacts.com/sabbath>

⁸ "Third Presidential Debate, October 19, 2016; "We have some bad hombres here and we're going to get them out." See <http://www.cnn.com/videos/politics/2016/10/19/third-presidential-debate-trump-immigration-bad-hombres-sot.cnn>

that Candidate Mr. Trump, now President Trump, presumably wants to keep out of our country.

25. Despite twelve years of reporting to ICE without incident, Mr. Rodriguez and the Rodriguez family has been recently informed by the Defendants that they intend to take their father from their family on his next date to report, on June 29, 2017, and deport him to El Salvador, a country that they have never known, a place where they speak a language that the Rodriguez children have not spoken as their native tongue. The Defendants have directed the power of the government of the United States of America to detain their father and to take him to that foreign land outside of the boundaries of their home nation, the land of their birth.

26. Moreover, the strange foreign country to which Defendants wish to sequester their father is one of the most dangerous, violent places in the world. Some refer to it as the “murder capital of the world.” The U.S. Department of State issued, on February 14, 2017, its latest in a series of travel warnings concerning El Salvador in which it ominously states: *“The Department of State warns U.S. citizens to carefully consider the risks of travel to El Salvador due to the high rates of crime and violence. El Salvador has one of the highest homicide levels in the world and crimes such as extortion, assault and robbery are common.”*⁹ The same State Department Bureau of Consular Affairs goes further: *“While the majority of the violence occurs between rival gangs and there is no information to suggest U.S. citizens are specifically targeted, its pervasiveness increases the chance of being caught in the wrong place at the wrong*

⁹ United States Department of State, Bureau of Consular Affairs, *Travel Advisory* (February 2017)

time."¹⁰ 2017 is definitely the wrong time for a family- for the Rodriguez family- to be deported to the country of El Salvador.

27. Defendants' threats to enforce the Order of Deportation will impose upon the family, who through no fault of their own are dependent upon their parents for protection, financial support, and most importantly, parental and spiritual guidance and example, a de facto religious deportation, an actual segregation of these children out of the country precisely because of their religious beliefs and of their family. In this case, deportation of Mr. Rodriguez would substantially burden the religious beliefs and practices of his wife and children. They would be forced to choose between giving up their religious belief in the closeness and integrity of their family or leaving the country with Mr. Rodriguez, which amounts to a de facto deportation of his entire family.

28. Until his status as the spouse of a United States citizen is approved and the appropriate waivers submitted and approved, Juan Rodriguez, the husband and father of this wholesome quintessential American family remains under threat of detention and transport to certain danger in a strange foreign land. Such de facto religious deportation would constitute a humanitarian travesty. His administrative applications remain mired in bureaucratic limbo and family's life on excruciating hold.

JUAN RODRIGUEZ'S PROCEDURAL HISTORY WITH THE IMMIGRATION AUTHORITIES

29. Mr. Juan Rodriguez is a native of El Salvador who was born on October 7, 1969.

30. On July 3, 2001, he entered the U.S. without inspection.

¹⁰ Id.

31. In October 2001, Mr. Rodriguez was detained by USCIS (formerly known as INS) and released on bond on October 19, 2001.

32. On December 17, 2001, Mr. Rodriguez married his wife, Celia Maria Vargas. Mr. Rodriguez and his wife have three children, namely, Karen Rodriguez (born September 2, 1998; naturalized citizen), Rebecca Rodriguez (born November 26, 2001; citizen by birth) and Kimberly Rodriguez (born November 6, 2006; citizen by birth).

33. On October 2001, Mr. Rodriguez appeared before an immigration judge and was granted voluntary departure in October 30, 2002. He filed a motion to reopen but it was subsequently denied on February 11, 2003. Mr. Rodriguez did not depart the U.S. and continued to report to ICE under its Order of Supervision for 11 years without incident.

34. Mr. Rodriguez's wife, Celia, became a U.S. citizen on July 21, 2010.

35. On March 7, 2017, Mrs. Celia Rodriguez filed an I-130, Petition for Alien Relative, on behalf of Mr. Rodriguez. This Petition is currently pending with the USCIS.

36. On June 9, 2017, counsel for Mr. Rodriguez, filed a Stay of Deportation along with other documentation but it was rejected because Mr. Rodriguez was not personally present.

37. On Friday, June 16, 2017, counsel for Mr. Rodriguez filed a Motion to Reopen Mr. Rodriguez' case with the Immigration Court with jurisdiction over his matter so that an Application for Asylum may be pursued within the immigration system for Mr. Rodriguez. A ruling from the Immigration Court remains pending.

38. On Monday, June 19, 2017, the Plaintiffs each filed their own forms I-246s requesting ICE to stay the deportation of Juan Rodriguez. The forms were rejected and not even accepted by ICE.

39. On June 29, 2017, Mr. Rodriguez is scheduled to appear before ICE for the required reporting under the ICE's Order of Supervision. He has been told by Defendants to expect to be detained and ultimately deported on that day. These directives to Mr. Rodriguez constitute an "Order of Deportation."

**VIOLATION OF THE RELIGIOUS FREEDOM RESTORATION ACT –
42 U.S.C. § 2000BB**

40. Plaintiffs' sincerely held religious beliefs as Adventists require them to be together with their parents and to live as a family until at least the children's complete maturity.

41. When Plaintiffs observe their Christian faith and personally held ethical and moral teachings on the importance and role of the family in their childhood development and live as a family consistent with their beliefs, they exercise religion within the meaning of the Religious Freedom Restoration Act (RFRA). Forcing family members to leave the country, giving up the many benefits of U.S. citizenship, in order to maintain their religious beliefs and practices is clearly a substantial burden.

42. The Order of Deportation and accompanying regulations and policies imposes a substantial burden on Plaintiffs' religious exercise and coerces them to change or violate their sincerely held religious beliefs because the family faces the de facto religious deportation of the entire family to a known violent war zone of unimaginable violence. A forced relocation of the family to El Salvador exposes the Plaintiffs, including the minor children, to grave and imminent danger. In fact, the United

States State Department has issued a Travel Advisory warning U.S. citizens of the danger of travel to the country of El Salvador for several years, including as recently as February 2017.

43. The Order of Deportation chills Plaintiffs' religious exercise within the meaning of RFRA.

44. The Order of Deportation exposes Plaintiffs to incredible and irreversible suffering for their religious exercise.

45. The Order of Deportation and its potential devastating effect on the lives of the Plaintiffs furthers no compelling governmental interest and is not narrowly tailored to any compelling governmental interest. Such actions by the Defendants only serve and further statistical and other interests.

46. The Order of Deportation is not the least restrictive means of furthering Defendants' stated interests.

47. The Order of Deportation and its resulting impact on the Rodriguez children and their de facto religious deportation violates RFRA.

VIOLATION OF FREE EXERCISE CLAUSE OF THE FIRST AMENDMENT TO THE UNITED STATES CONSTITUTION

48. Plaintiffs' sincerely held religious beliefs require them to be together with their parents and to live as a family until at least their complete maturity.

49. When Plaintiffs observe their Christian and personally held ethical and moral teachings on the importance and role of the family in their childhood development and live as a family consistent with their beliefs, they exercise religion within the meaning of the Free Exercise Clause.

50. The Order of Deportation is not neutral and is not generally applicable.

51. Defendants have created categorical exemptions and individualized exemptions to the Order of Deportation. These are sometimes inconsistently applied.

52. The Order of Deportation furthers no compelling governmental interest. Such actions by the Defendants only serve and further political and statistical interests.

53. The Order of Deportation is not the least restrictive means of furthering Defendants' stated interests.

54. The Order of Deportation coerces Plaintiffs to change or violate their sincerely held religious beliefs.

55. The Order of Deportation chills Plaintiffs' religious exercise.

56. The Order of Deportation exposes Plaintiffs to significant physical danger for their religious exercise.

57. The Order of Deportation imposes a substantial burden on Plaintiffs' religious exercise of religion.

58. The Order of Deportation and its potential devastating effect on the lives of the Rodriguez children is not narrowly tailored to serve a compelling governmental interest.

59. Defendants designed and implemented the Order of Deportation, and its policies and procedures, in a way that makes it impossible for Plaintiffs and other similar religious Americans to peacefully and safely observe their sincerely held religious beliefs.

60. Defendants promulgated both the Order of Deportation with the purpose and intent to suppress the religious exercise of Plaintiffs and others.

61. The Order of Deportation violates Plaintiffs' rights secured to them by the Free Exercise Clause of the First Amendment of the United States Constitution.

**VIOLATION OF THE DUE PROCESS CLAUSE OF THE
FIFTH AMENDMENT TO THE UNITED STATES CONSTITUTION**

62. Because the Order of Deportation and the accompanying policies and procedures substantially infringe upon religious exercise rights that are constitutionally protected, it is unconstitutionally vague and overbroad in violation of the due process rights of Plaintiffs. This is a violation of the procedural and substantive Due Process Rights of the Plaintiffs because in enforcing the Order of Deportation and its accompanying procedures and regulations, the Defendants :

- a. Did not consider the rights of the U.S. citizen children and wife in enforcing the Order of Deportation;
- b. Required Juan Rodriguez to personally attend the stay of deportation hearing on Friday, June 9th, when the practice had previously been that the physical presence of the immigrant was not required;
- c. Did not consider the rights of the U.S. citizen children and wife in processing the waiver application for Rodriguez to wait in the United States while his I-130 Petition for Alien by Immigrant Spouse is being considered;
- d. Did not satisfy the intent of the President's Executive Order that requires Defendants to prioritize for deportation those undocumented immigrants with a criminal record, the so-called "bad hombres";
- e. Applied inconsistent procedures and policies in executing existing Presidential directives that permit the use of discretion to be informed by

the reality of the impact of immigration actions upon citizen children such as Plaintiffs;

- f. Did not permit Plaintiffs' filing of the Form I-246 Request for Stay of Deportation on Monday, June 19, 2017; and
- g. Did not consider the "extreme hardship" that would be suffered by the Plaintiffs by the enforcement of the Order of Deportation.

63. Persons of common intelligence must necessarily guess at the meaning, scope, and application of the Order of Deportation and the accompanying policies and procedures. They instead lend themselves to discriminatory enforcement by government officials in an arbitrary and capricious manner.

64. The Order of Deportation vests Defendants with unbridled discretion.

65. This Order of Deportation and its accompanying enforcement actions are an unconstitutional violation of Plaintiffs' due process rights under the Fifth Amendment to the United States Constitution.

VIOLATION OF THE FIFTH AMENDMENT TO THE UNITED STATES CONSTITUTION RIGHT TO FUNDAMENTAL LIBERTY INTERESTS

66. Between the written text of the Bill of Rights, on the one hand, and the surrounding "penumbra" wherein the U.S. Supreme Court has found that the life of an unborn child can be terminated, on the other hand, our Constitution has sufficient foundation, moral clarity, and force to identify and enforce a right to preserve and celebrate a close and wholesome Christian American family.

67. Plaintiffs possess the fundamental constitutional right to remain in the United States.

68. Plaintiffs also possess the fundamental constitutional right to family unity to keep their family intact.

69. Defendants' Order of Deportation and accompanying regulations require and/or attempt to coerce the Plaintiffs to leave the United States in order to enjoy the fundamental rights to life, liberty, and the pursuit of happiness.

70. Defendants' Order of Deportation and accompanying regulations require or attempt to coerce a separation of the Rodriguez children from their parents. Defendants' actions cause an unnatural separation of families, of children from their parents, of minor children from their loving and devoted parents.

71. Defendant's Order of Deportation and accompanying regulations infringe upon and violates Plaintiffs' rights secured to them by the Due Process Clause of the United States Constitution.

APPLICATION FOR PRELIMINARY INJUNCTION

72. Plaintiffs Karen Rodriguez, Celia Rodriguez, individually and as next friend of her minor children, Rebecca Rodriguez and Kimberly Rodriguez, hereby apply to the Court for a preliminary and permanent injunction enjoining all Defendants from the following:

- a. Ruling upon or considering the I-246 Stay of Deportation or Removal filed on behalf of Juan Rodriguez without considering the rights and interests of the Plaintiffs to be heard on the merits of the request;
- b. Ruling upon or considering any waivers or applications for pardon requests affecting the status of Juan Rodriguez in the United States without considering the rights and interests of the children of the Plaintiffs to be heard on the merits of the requests;

- c. Ruling upon or considering any requests affecting the status of Juan Rodriguez in the United States without considering the rights and interests of the children of the Plaintiffs to be heard on the merits of the requests;
- d. Enforcing the Order of Deportation or otherwise removing Juan Rodriguez from the United States;
- e. Attempting to separate the Plaintiffs' wife and children from Juan Rodriguez while enforcing the Order of Deportation;
- f. Requiring Juan Rodriguez to leave the United States and enter the country of El Salvador while his waivers and other regulatory requests are under consideration; and
- g. Requiring Juan Rodriguez to leave the United States or detaining Juan Rodriguez while any request affecting his status is ultimately and finally ruled upon.

73. The application is made on the basis of Declarations and Initial Memorandum of Law in Support of Plaintiffs' Application for Preliminary Injunction filed herewith.

74. As set forth in detail in the Memorandum of Law, Plaintiffs have established that they are likely to succeed on the merits that their family should remain intact in the United States; that Plaintiffs will suffer irreparable harm if the Court does not enjoin the actions detailed above, including enjoining the deportation of Juan Rodriguez; that the Defendants will suffer no harm if the Court preserves the status quo pending adjudication of this matter and Mr. Rodriguez's immigration matter on the

merits; that the balance of hardships weighs strongly in Plaintiffs' favor; and that a preliminary injunction in this case advances the public interest.

75. For these reasons and the reasons detailed in the Memorandum of Law in Support of Plaintiffs' Application for Preliminary Injunction, Plaintiffs respectfully request the Court grant the Application as requested.

76. WHEREFORE, PREMISES CONSIDERED Plaintiffs Karen Rodriguez, Rebecca Rodriguez, Kimberly Rodriguez and Celia Rodriguez respectfully request that the Court:

- a. Enter a judgment declaring the Order of Deportation and its application to Plaintiffs to be an unconstitutional violation of their rights protected by the Religious Freedom Restoration Act, the Free Exercise Clause of the First Amendment to the United States Constitution, the Due Process Clause of the Fifth Amendment to the United States Constitution, and therefore invalid in any way applicable to them;
- b. Issue a preliminary and permanent injunction as requested above; and
- c. Award such other and further relief as it deems equitable and just.

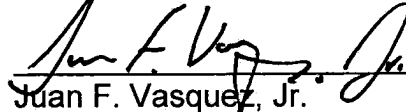
JURY DEMAND

Plaintiffs request a trial by jury on all issues.

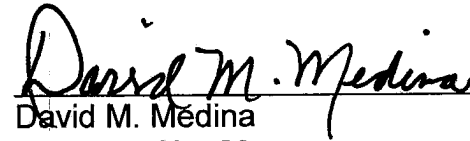
Respectfully submitted,

**CHAMBERLAIN, HRDLICKA, WHITE,
WILLIAMS & AUGHTRY**

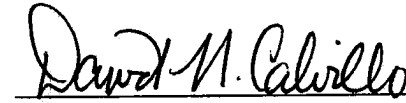
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VERIFICATION

STATE OF TEXAS

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COUNTY OF HARRIS

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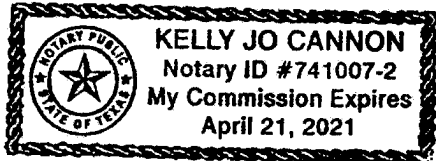
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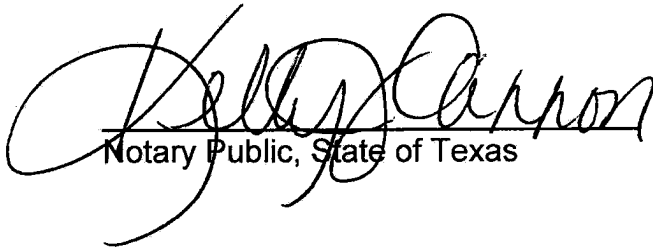
BEFORE ME, the undersigned authority, on this day personally appeared Karen Rodriguez, known to me to be the person whose name is subscribed to the foregoing instrument, and after being duly sworn, stated that the above and foregoing statements in the Verified Complaint And Application for Injunctive Relief are true and correct.



Karen Rodriguez

SWORN TO AND SUBSCRIBED BEFORE ME by the said Karen Rodriguez on this the 19th day of June, 2017, to certify which witness my hand and seal of office.





Notary Public, State of Texas