

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

CONNIE ROGERS,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No.
	)	
CITY OF COLLEGE PARK,	)	
GEORGIA,	)	JURY TRIAL DEMANDED
	)	
Defendant.	)	

COMPLAINT

Plaintiff Connie Rogers (“Plaintiff” or “Rogers”), through undersigned counsel, brings this action against Defendant City of College Park, Georgia (“Defendant” or “the City of College Park”), and states as follows:

NATURE OF THE ACTION

1. The City of College Park terminated Connie Rogers after three years as Chief of Police despite her successful performance. Rogers’s removal was based on her sexual orientation and in retaliation for her reported complaints of suspected of public funds. Accordingly, Rogers brings this action for intentional discrimination under the Equal Protection Clause and Title VII and retaliation under the Georgia Whistleblower Act.

JURISDICTION AND VENUE

2. This Court has subject matter jurisdiction over Rogers's federal claims under 28 U.S.C. §§ 1331 and 1343. Rogers brings her equal protection claim through 42 U.S.C. § 1983 and her Title VII claim under 42 U.S.C. § 2000e et seq.

3. This Court has supplemental jurisdiction over Rogers's claim under O.C.G.A. § 45-1-4 pursuant to 28 U.S.C. § 1367 because that claim and her federal claims arise from the same employment relationship and termination and form part of the same case or controversy.

4. Venue is proper in this District under 28 U.S.C. § 1391(b) and 42 U.S.C. § 2000e-5(f)(3). The challenged employment practices occurred in College Park, Georgia, within this District, and Plaintiff would have continued working here but for those practices. Assignment to the Atlanta Division is proper because the events occurred in Fulton County.

PARTIES

5. Plaintiff Connie Rogers is a natural person and a citizen of Coweta County, Georgia. Defendant employed Plaintiff as its Chief of Police from December 2022 until December 2025.

6. Defendant City of College Park, Georgia, is a municipal corporation organized under Georgia law and a political subdivision of the State of Georgia.

Defendant operates the College Park Police Department and employed Plaintiff throughout the relevant period.

7. Defendant may be served through its registered agent at 3667 Main St., College Park, GA, 30337.

8. Upon information and belief, Defendant received funds from the State of Georgia or a state agency during the relevant period and was a public employer under O.C.G.A. § 45-1-4(a)(4).

9. Plaintiff was its public employee under § 45-1-4(a)(3).

ADMINISTRATIVE EXHAUSTION

10. Plaintiff filed a Charge of Discrimination with the Equal Employment Opportunity Commission (“EEOC”), naming Defendant and challenging Defendant’s decision to terminate her employment as discrimination because of sex, including sexual orientation. The charge was filed within the applicable administrative filing period.

11. The EEOC issued a Notice of Right to Sue concerning Plaintiff’s Title VII claim, and Plaintiff brings this action within ninety (90) days of receipt of that notice.

FACTUAL ALLEGATIONS

12. Plaintiff became the City's Chief of Police in December 2022 and served in that role until December 2025. She was qualified for the position and performed her duties successfully.

13. Plaintiff inherited a department that was short thirty-nine officers. During her tenure, she improved morale, introduced technology to increase efficiency, and achieved a twelve percent reduction in crime. She also secured a \$10,000 community-engagement donation, one of only four such awards nationwide.

14. Plaintiff is in a same-sex relationship.

15. From December 2022 through November 2023, then-Councilman Joe Carn repeatedly directed Rogers to find grounds to terminate or demote Deputy Chief Sharis McCrary without providing a legitimate cause or supporting documentation.

16. Beginning in December 2023 and continuing through April 2025, Rogers was also pressured to rehire a retired officer because of his political connections, without regard to departmental needs or a fair hiring process.

17. In May 2024, Councilwoman McKenzie requested the arrest of an individual she had accused of harassment through social media. The Police Department investigated the accusation and determined that that individual had not

violated the law. Following the investigation, Councilman Roderick Gay later told Plaintiff that McKenzie believed Plaintiff had failed to meet her expectations.

18. On or about August 9, 2024, former City Manager Emmanuel Adediran and Councilwoman McKenzie instructed Plaintiff to draft a letter in support of McKenzie's husband after he was asked to leave a council meeting. Rogers considered that directive inconsistent with her obligations as Chief of Policy to administer law enforcement impartially.

19. In January 2025, Deputy Chief McCrary informed Plaintiff that Police Department funds had been used to purchase two golf carts priced just under \$10,000. Plaintiff was responsible for the Department's budget but had not requested or approved those purchases.

20. Former City Manager Adediran had signed an invoice at Councilman Carn's direction to purchase the two golf carts. While Defendant's policies permitted the City Manager to approve purchases below \$10,000 without a vote by the Mayor and Council, Plaintiff believed that Adediran and Carn sought the purchases at below \$10,000 to avoid having to go through Plaintiff for approval.

21. Upon learning of the purchase of the two golf carts, Plaintiff complained to former City Manager Adediran about the misuse of the Department's funds to purchase golf carts without her approval. She reported that the funds had

been used for purchases with the Department's budget that she had neither requested nor authorized.

22. Plaintiff also reported to Defendant's next City Manager, Lydell Miller, that an officer was "double dipping" by receiving payment for work performed at a festival even though the officer was off duty.

23. Plaintiff made those complaints in good faith because she reasonably believed the expenditures and duplicate compensation involved unlawful misuse of public funds.

24. City Managers Adediran and Miller were City officials to whom Plaintiff reported the suspected misuse of public funds.

25. In July 2025, Plaintiff sought warrants for Nichole Menzie's suspected misappropriation of more than \$500,000 in City funds through a fraudulent contract. Ms. Menzie is an associate of Councilwoman McKenzie and Councilwoman Tracie Arnold. Former Councilman Tracey Wyatt, who was in a relationship with Arnold, had signed the contract without the City Council's approval.

26. In August 2025, City Manager Miller told Plaintiff that council members had requested her termination. Miller initially declined to terminate Plaintiff because she believed Rogers was performing excellently as Chief.

27. During Plaintiff's tenure as Defendant's Chief of Police, she was also asked to approve arrest warrants for a political foe of Councilwoman McKenzie.

28. Council members began to repeatedly question Plaintiff's qualifications and the accuracy of the Department's crime reports, despite Plaintiff's record of achievements.

29. On or about November 21, 2025, Michael Hicks became Interim City Manager.

30. On or about December 9, 2025, Deputy Chief McCrary told Plaintiff that Hicks intended to terminate her at a meeting scheduled for December 10, 2025. McCrary also told Plaintiff that an outside agency would escort her from the premises at Councilwoman McKenzie's request.

31. Plaintiff was also informed that the request to terminate her employment came from Councilwoman McKenzie and Councilman Carn.

32. In response, Plaintiff submitted a grievance to the city council on December 9, 2025, in which she identified a sustained pattern of inappropriate pressures, unethical directives, and politically motivated interference she had experienced during her tenure as Chief of Police with the City of College Park.

33. In her grievance, Plaintiff also alleged she was being retaliated against for issuing valid arrest warrants individuals linked the theft of City funds.

34. In response to the warning about her impending termination, and in an effort to protect her future career opportunities, Plaintiff resigned her position as Defendant's Chief of Police.

35. Before Interim City Manager Hicks and council members made the decision to terminate Plaintiff, they each knew of Plaintiff's complaints of misuse of department funds and political favors to Adediran and Miller.

36. After Plaintiff's employment with Defendant ended, Plaintiff learned that Councilwoman McKenzie wanted to terminate Plaintiff because Plaintiff is married to another woman.

37. Councilwoman McKenzie's stated objection to Plaintiff's same-sex marriage, her efforts to secure Plaintiff's termination, and Hicks's implementation of McKenzie's demands support the inference that Plaintiff's sexual orientation was a reason for Defendant's decision to terminate her employment. That decision followed then-City Manager Miller's refusal to discharge Plaintiff because of her strong performance.

38. On January 8, 2026, Rogers submitted an addendum to her December 9, 2025, grievance to Defendant's City Council, City Attorney, City Manager, and its Human Resources Department. She described political interference and retaliation for pursuing suspected misuse of City funds and requested an impartial investigation.

39. Under Article IV, § 4-3 of the City Charter, the City Manager exercises administrative control over regular departments, including the appointment, removal, and discipline of department heads, including the Chief of Police.

40. Hicks, the interim city Manager at the time of the termination decision, supported and approved of the decision to terminate Plaintiff's employment and as City Manager for Defendant had final policymaking authority on personnel decisions.

41. As a result, Plaintiff lost salary, benefits, retirement contributions, and other compensation and suffered emotional distress and harm to her professional standing. Her losses continue.

COUNT I

Denial of Equal Protection Based on Sexual Orientation 42 U.S.C. Section 1983

42. Plaintiff incorporates the foregoing paragraphs as though fully set forth here.

43. The Fourteenth Amendment prohibits a municipality from intentionally denying an employee equal protection of the laws because of sexual orientation..

44. Defendant, through its City Manager who has final policymaking authority on personnel decisions, intentionally selected Plaintiff for termination because of her sexual orientation. Her orientation bore no rational relationship to her qualifications, performance, or ability to lead the Police Department.

45. Defendant's discriminatory treatment reflected hostility toward Plaintiff's sexual orientation and lacked a rational relationship to any legitimate

governmental purpose. Personal disapproval of that orientation supplied no legitimate basis to remove a successful Police Chief.

46. Defendant's City Manager who made and implemented Defendant's decision to terminate Plaintiff acted under color of state law. This final policymaking decision was a moving force behind the deprivation of Plaintiff's constitutional rights.

47. The discriminatory decision proximately caused Plaintiff lost compensation, emotional distress, and other compensable injuries. She seeks damages and appropriate equitable relief under § 1983 and reasonable attorney's fees under 42 U.S.C. § 1988.

COUNT II

Sex Discrimination in Termination Based on Sexual Orientation Title VII of the Civil Rights Act of 1964

48. Plaintiff incorporates the foregoing paragraphs as though fully set forth here.

49. Title VII prohibits an employer from discharging an employee because of sex. Discharging an employee because of sexual orientation constitutes discrimination because of sex.

50. Plaintiff was qualified for the Chief of Police position, performed that job successfully, and suffered an adverse employment action when Defendant made the decision to terminate her employment.

51. Defendant's decision to terminate Plaintiff was in part based on her sexual orientation in that her sex and sexual orientation were but-for causes of Defendant's decision and motivating factors within the meaning of 42 U.S.C. § 2000e-2(m).

52. Defendant is responsible under Title VII for the actions of the officials who made and implemented the employment decision. Councilwoman McKenzie's expressed orientation-based hostility and her participation in procuring Plaintiff's removal, support an inference of intentional discrimination based on Plaintiff's sexual orientation.

53. Defendant's sex-based discrimination caused Plaintiff to lose wages, employment benefits, and retirement compensation and to suffer emotional distress and other compensable harm. She seeks all relief available under Title VII and 42 U.S.C. § 1981a, including back pay, appropriate equitable relief, compensatory damages subject to applicable statutory limits, and reasonable attorney's fees and costs.

COUNT III

Retaliation Under the Georgia Whistleblower Act O.C.G.A. Section 45-1-4

54. Plaintiff incorporates the foregoing paragraphs as though fully set forth here.

55. Plaintiff was a public employee, and Defendant was a public employer, within the meaning of O.C.G.A. § 45-1-4.

56. Before Defendant made the decision to terminate Plaintiff, Plaintiff disclosed instances of suspected misuse of Police Department funds to Defendant's City Council and its City Manager.

57. The City Manager and the City Council are supervisors within the meaning of O.C.G.A. § 45-1-4(a)(6), based on the authority identified above.

58. Plaintiff's complaints disclosed violations of or noncompliance with the laws, rules, or regulations identified above and were protected under § 45-1-4(d)(2).

59. Plaintiff made her disclosures in good faith, without knowledge that they were false or reckless disregard for their truth or falsity.

60. Defendant's officials who procured and implemented Plaintiff's termination knew of her protected disclosures before the decision. The City made the decision to terminate her employment in part because Plaintiff reported the suspected misuse of public funds and the improper use of policy authority to issue arrest warrants.

61. Plaintiff's protected disclosures were a but-for cause of her termination. The effort to remove her despite her successful performance and the

prior City Manager's refusal to discharge her, together with the participants' knowledge and the circumstances described above, support a causal connection.

62. By terminating Plaintiff for her protected disclosures, the City violated O.C.G.A. § 45-1-4(d)(2). The statute waives Defendant's sovereign immunity for this claim to the extent provided by Georgia law.

63. Plaintiff brings this claim within one year after discovering the retaliation and within three years after it occurred, as required by O.C.G.A. § 45-1-4(e)(1).

64. Defendant's retaliation caused Plaintiff to lose compensation and benefits and suffer other compensable injuries. She seeks the relief authorized by O.C.G.A. § 45-1-4(e) and (f), including appropriate equitable relief, restoration of benefits and seniority, back pay, compensatory damages, and reasonable attorney's fees, court costs, and expenses.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff requests that the Court enter judgment in her favor and against Defendant and:

A. Declare that Defendant's conduct violated the Equal Protection Clause, Title VII, and the Georgia Whistleblower Act;

B. Award back pay, lost benefits, retirement losses, and other lost compensation, with interest as permitted by law;

C. Order reinstatement to the Chief of Police position with appropriate seniority and benefits, or award front pay in lieu of reinstatement where authorized and appropriate;

D. Award compensatory damages for emotional distress and other compensable injuries in an amount to be determined at trial, subject to the limits applicable to each claim and without duplicate recovery;

E. Order appropriate corrective equitable relief, including removal of discriminatory or retaliatory termination entries from Rogers's personnel records;

F. Award reasonable attorney's fees, costs, and expenses under 42 U.S.C. § 1988, 42 U.S.C. § 2000e-5(k), and O.C.G.A. § 45-1-4(f), as applicable;

G. Award prejudgment and postjudgment interest as permitted by law; and

H. Grant such additional relief as the Court deems just and proper.

JURY TRIAL DEMANDED

Respectfully submitted this 22nd day of October, 2026.

HKM Employment Attorneys LLP

/s/ Jerilyn E. Gardner

Jerilyn E. Gardner

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vice forthcoming)
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Email: adavis@hkm.com

Counsel for Plaintiff Rogers

The JS44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form is required for the use of the Clerk of Court for the purpose of initiating the civil docket record. (SEE INSTRUCTIONS ATTACHED)

I. (a) PLAINTIFF(S)

CONNIE ROGERS

DEFENDANT(S)

CITY OF COLLEGE PARK, GEORGIA

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF COWETA
(EXCEPT IN U.S. PLAINTIFF CASES)

COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT _____
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED

(c) ATTORNEYS (FIRM NAME, ADDRESS, TELEPHONE NUMBER, AND E-MAIL ADDRESS)

Jerilyn E. Gardner and Artur Davis
HKM Employment Attorneys LLP
3344 Peachtree Rd., NE, Suite 800, Office #35
Atlanta, GA 30326
jgardner@hkm.com (404) 446-9544

ATTORNEYS (IF KNOWN)**II. BASIS OF JURISDICTION**

(PLACE AN "X" IN ONE BOX ONLY)

- ☐ 1 U.S. GOVERNMENT PLAINTIFF
☐ 2 U.S. GOVERNMENT DEFENDANT
☒ 3 FEDERAL QUESTION (U.S. GOVERNMENT NOT A PARTY)
☐ 4 DIVERSITY (INDICATE CITIZENSHIP OF PARTIES IN ITEM III)

III. CITIZENSHIP OF PRINCIPAL PARTIES(PLACE AN "X" IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT)
(FOR DIVERSITY CASES ONLY)

- | PLF | DEF | | PLF | DEF | |
|----------------------------|----------------------------|---|----------------------------|----------------------------|---|
| ☐ 1 | ☐ 1 | CITIZEN OF THIS STATE | ☐ 4 | ☐ 4 | INCORPORATED OR PRINCIPAL PLACE OF BUSINESS IN THIS STATE |
| ☐ 2 | ☐ 2 | CITIZEN OF ANOTHER STATE | ☐ 5 | ☐ 5 | INCORPORATED AND PRINCIPAL PLACE OF BUSINESS IN ANOTHER STATE |
| ☐ 3 | ☐ 3 | CITIZEN OR SUBJECT OF A FOREIGN COUNTRY | ☐ 6 | ☐ 6 | FOREIGN NATION |

IV. ORIGIN

(PLACE AN "X" IN ONE BOX ONLY)

- ☒ 1 ORIGINAL PROCEEDING
☐ 2 REMOVED FROM STATE COURT
☐ 3 REMANDED FROM APPELLATE COURT
☐ 4 REINSTATED OR REOPENED
☐ 5 TRANSFERRED FROM ANOTHER DISTRICT (Specify District) _____
☐ 6 MULTIDISTRICT LITIGATION - TRANSFER
☐ 7 APPEAL TO DISTRICT JUDGE FROM MAGISTRATE JUDGE JUDGMENT
☐ 8 MULTIDISTRICT LITIGATION - DIRECT FILE

V. CAUSE OF ACTION

(CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE - DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY)

Title VII of the Civil Rights Act of 1964 - 42 U.S.C. §§ 2000e et seq.; Equal Protection - 42 U.S.C. § 1983; and O.C.G.A. § 45-1-4

- ☐ YES ☒ NO Does the relief requested in the complaint or petition seek to bar or mandate statewide and/or nationwide enforcement of a state and/or federal law, including a rule, regulation, policy, or order of the executive branch or a state and/or federal agency, whether by declaratory judgment and/or any form of injunctive relief?

(IF COMPLEX, CHECK REASON BELOW)

- | | |
|---|---|
| ☐ 1. Unusually large number of parties. | ☐ 6. Problems locating or preserving evidence |
| ☐ 2. Unusually large number of claims or defenses. | ☐ 7. Pending parallel investigations or actions by government. |
| ☐ 3. Factual issues are exceptionally complex | ☐ 8. Multiple use of experts. |
| ☐ 4. Greater than normal volume of evidence. | ☐ 9. Need for discovery outside United States boundaries. |
| ☐ 5. Extended discovery period is needed. | ☐ 10. Existence of highly technical issues and proof. |

CONTINUED ON REVERSE**FOR OFFICE USE ONLY**

RECEIPT # _____	AMOUNT \$ _____	APPLYING IFP _____	MAG. JUDGE (IFP) _____
JUDGE _____	MAG. JUDGE _____ (Referral)	NATURE OF SUIT _____	CAUSE OF ACTION _____

VI. NATURE OF SUIT (PLACE AN "X" IN ONE BOX ONLY)CONTRACT - "0" MONTHS DISCOVERY TRACK

- ☐ 150 RECOVERY OF OVERPAYMENT & ENFORCEMENT OF JUDGMENT
- ☐ 152 RECOVERY OF DEFAULTED STUDENT LOANS (Excl. Veterans)
- ☐ 153 RECOVERY OF OVERPAYMENT OF VETERAN'S BENEFITS

CONTRACT - "4" MONTHS DISCOVERY TRACK

- ☐ 110 INSURANCE
- ☐ 120 MARINE
- ☐ 130 MILLER ACT
- ☐ 140 NEGOTIABLE INSTRUMENT
- ☐ 151 MEDICARE ACT
- ☐ 160 STOCKHOLDERS' SUITS
- ☐ 190 OTHER CONTRACT
- ☐ 195 CONTRACT PRODUCT LIABILITY
- ☐ 196 FRANCHISE

REAL PROPERTY - "4" MONTHS DISCOVERY TRACK

- ☐ 210 LAND CONDEMNATION
- ☐ 220 FORECLOSURE
- ☐ 230 RENT LEASE & EJECTMENT
- ☐ 240 TORTS TO LAND
- ☐ 245 TORT PRODUCT LIABILITY
- ☐ 290 ALL OTHER REAL PROPERTY

TORTS - PERSONAL INJURY - "4" MONTHS DISCOVERY TRACK

- ☐ 310 AIRPLANE
- ☐ 315 AIRPLANE PRODUCT LIABILITY
- ☐ 320 ASSAULT, LIBEL & SLANDER
- ☐ 330 FEDERAL EMPLOYERS' LIABILITY
- ☐ 340 MARINE
- ☐ 345 MARINE PRODUCT LIABILITY
- ☐ 350 MOTOR VEHICLE
- ☐ 355 MOTOR VEHICLE PRODUCT LIABILITY
- ☐ 360 OTHER PERSONAL INJURY
- ☐ 362 PERSONAL INJURY - MEDICAL MALPRACTICE
- ☐ 365 PERSONAL INJURY - PRODUCT LIABILITY
- ☐ 367 PERSONAL INJURY - HEALTH CARE/ PHARMACEUTICAL PRODUCT LIABILITY
- ☐ 368 ASBESTOS PERSONAL INJURY PRODUCT LIABILITY

TORTS - PERSONAL PROPERTY - "4" MONTHS DISCOVERY TRACK

- ☐ 370 OTHER FRAUD
- ☐ 371 TRUTH IN LENDING
- ☐ 380 OTHER PERSONAL PROPERTY DAMAGE
- ☐ 385 PROPERTY DAMAGE PRODUCT LIABILITY

BANKRUPTCY - "0" MONTHS DISCOVERY TRACK

- ☐ 422 APPEAL 28 USC 158
- ☐ 423 WITHDRAWAL 28 USC 157

CIVIL RIGHTS - "4" MONTHS DISCOVERY TRACK

- ☐ 440 OTHER CIVIL RIGHTS
- ☒ 441 VOTING
- ☐ 442 EMPLOYMENT
- ☐ 443 HOUSING/ ACCOMMODATIONS
- ☐ 445 AMERICANS with DISABILITIES - Employment
- ☐ 446 AMERICANS with DISABILITIES - Other
- ☐ 448 EDUCATION

IMMIGRATION - "0" MONTHS DISCOVERY TRACK

- ☐ 462 NATURALIZATION APPLICATION
- ☐ 465 OTHER IMMIGRATION ACTIONS

PRISONER PETITIONS - "0" MONTHS DISCOVERY TRACK

- ☐ 463 HABEAS CORPUS- Alien Detainee
- ☐ 510 MOTIONS TO VACATE SENTENCE
- ☐ 530 HABEAS CORPUS
- ☐ 535 HABEAS CORPUS DEATH PENALTY
- ☐ 540 MANDAMUS & OTHER
- ☐ 550 CIVIL RIGHTS - Filed Pro se
- ☐ 555 PRISON CONDITION(S) - Filed Pro se
- ☐ 560 CIVIL DETAINEE: CONDITIONS OF CONFINEMENT

PRISONER PETITIONS - "4" MONTHS DISCOVERY TRACK

- ☐ 550 CIVIL RIGHTS - Filed by Counsel
- ☐ 555 PRISON CONDITION(S) - Filed by Counsel

FORFEITURE/PENALTY - "4" MONTHS DISCOVERY TRACK

- ☐ 625 DRUG RELATED SEIZURE OF PROPERTY 21 USC 881
- ☐ 690 OTHER

LABOR - "4" MONTHS DISCOVERY TRACK

- ☐ 710 FAIR LABOR STANDARDS ACT
- ☐ 720 LABOR/MGMT. RELATIONS
- ☐ 740 RAILWAY LABOR ACT
- ☐ 751 FAMILY and MEDICAL LEAVE ACT
- ☐ 790 OTHER LABOR LITIGATION
- ☐ 791 EMPL. RET. INC. SECURITY ACT

PROPERTY RIGHTS - "4" MONTHS DISCOVERY TRACK

- ☐ 820 COPYRIGHTS
- ☐ 840 TRADEMARK
- ☐ 880 DEFEND TRADE SECRETS ACT OF 2016 (DTSA)

PROPERTY RIGHTS - "8" MONTHS DISCOVERY TRACK

- ☐ 830 PATENT
- ☐ 835 PATENT-ABBREVIATED NEW DRUG APPLICATIONS (ANDA) - a/k/a Hatch-Waxman cases

SOCIAL SECURITY - "0" MONTHS DISCOVERY TRACK

- ☐ 861 HIA (1395ff)
- ☐ 862 BLACK LUNG (923)
- ☐ 863 DIWC (405(g))
- ☐ 863 DIWW (405(g))
- ☐ 864 SSID TITLE XVI
- ☐ 865 RSI (405(g))

FEDERAL TAX SUITS - "4" MONTHS DISCOVERY TRACK

- ☐ 870 TAXES (U.S. Plaintiff or Defendant)
- ☐ 871 IRS - THIRD PARTY 26 USC 7609

OTHER STATUTES - "4" MONTHS DISCOVERY TRACK

- ☐ 375 FALSE CLAIMS ACT
- ☐ 376 Qui Tam 31 USC 3729(a)
- ☐ 400 STATE REAPPORTIONMENT
- ☐ 430 BANKS AND BANKING
- ☐ 450 COMMERCE/ICC RATES/ETC.
- ☐ 460 DEPORTATION
- ☐ 470 RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS
- ☐ 480 CONSUMER CREDIT
- ☐ 485 TELEPHONE CONSUMER PROTECTION ACT
- ☐ 490 CABLE/SATELLITE TV
- ☐ 890 OTHER STATUTORY ACTIONS
- ☐ 891 AGRICULTURAL ACTS
- ☐ 893 ENVIRONMENTAL MATTERS
- ☐ 895 FREEDOM OF INFORMATION ACT 899
- ☐ 899 ADMINISTRATIVE PROCEDURES ACT / REVIEW OR APPEAL OF AGENCY DECISION
- ☐ 950 CONSTITUTIONALITY OF STATE STATUTES

OTHER STATUTES - "8" MONTHS DISCOVERY TRACK

- ☐ 410 ANTITRUST
- ☐ 850 SECURITIES / COMMODITIES / EXCHANGE

OTHER STATUTES - "0" MONTHS DISCOVERY TRACK

- ☐ 896 ARBITRATION (Confirm / Vacate / Order / Modify)

*** PLEASE NOTE DISCOVERY TRACK FOR EACH CASE TYPE. SEE LOCAL RULE 26.3**

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF CLASS ACTION UNDER F.R.Civ.P. 23 DEMAND \$ _____

JURY DEMAND ☒ YES ☐ NO (CHECK YES ONLY IF DEMANDED IN COMPLAINT)

VIII. RELATED/REFILED CASE(S) IF ANY

JUDGE _____ DOCKET NO. _____

CIVIL CASES ARE DEEMED RELATED IF THE PENDING CASE INVOLVES: (CHECK APPROPRIATE BOX)

- ☐ 1. PROPERTY INCLUDED IN AN EARLIER NUMBERED PENDING SUIT.
- ☐ 2. SAME ISSUE OF FACT OR ARISES OUT OF THE SAME EVENT OR TRANSACTION INCLUDED IN AN EARLIER NUMBERED PENDING SUIT.
- ☐ 3. VALIDITY OR INFRINGEMENT OF THE SAME PATENT, COPYRIGHT OR TRADEMARK INCLUDED IN AN EARLIER NUMBERED PENDING SUIT.
- ☐ 4. APPEALS ARISING OUT OF THE SAME BANKRUPTCY CASE AND ANY CASE RELATED THERETO WHICH HAVE BEEN DECIDED BY THE SAME BANKRUPTCY JUDGE.
- ☐ 5. REPETITIVE CASES FILED BY PRO SE LITIGANTS.
- ☐ 6. COMPANION OR RELATED CASE TO CASE(S) BEING SIMULTANEOUSLY FILED (INCLUDE ABBREVIATED STYLE OF OTHER CASE(S)):

- ☐ 7. EITHER SAME OR ALL OF THE PARTIES AND ISSUES IN THIS CASE WERE PREVIOUSLY INVOLVED IN CASE NO. _____, WHICH WAS DISMISSED. This case ☐ IS ☐ IS NOT (check one box) SUBSTANTIALLY THE SAME CASE.

Jerilyn E. Gardner

SIGNATURE OF ATTORNEY OF RECORD

October 22, 2026

DATE