

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

Civil Action No.: _____

Constitutional Association of Parental Rights Advocates, class)
action plaintiffs, also on behalf of all other persons so similarly)
situated herein, and *ex relatione* the United States of America,)

Plaintiffs,)

v.)

) Class Action
) Complaint

U.S. Department of Health and Human Services, U.S. Dept. of)
Health and Human Services / Administration for Children and)
Families, U.S. Senate, U.S. House of Representatives, State of)
Alabama, State of Alaska, State of Arizona, State of Arkansas,)
State of California, State of Colorado, State of Connecticut,)
State of Delaware, State of Florida, State of Georgia, State of)
Hawaii, State of Idaho, State of Illinois, State of Indiana, State)
of Iowa, State of Kansas, Commonwealth of Kentucky, State of)
Louisiana, State of Maine, State of Maryland, Commonwealth)
of Massachusetts, State of Michigan, State of Minnesota, State)
of Mississippi, State of Missouri, State of Montana, State of)
Nebraska, State of Nevada, State of New Hampshire, State of)
New Jersey, State of New Mexico, State of New York, State of)
North Carolina, State of North Dakota, State of Ohio, State of)
Oklahoma, State of Oregon, Commonwealth of Pennsylvania,)
State of Rhode Island, State of South Carolina, State of South)
Dakota, State of Tennessee, State of Texas, State of Utah, State)
of Vermont, Commonwealth of Virginia, State of Washington,)
State of West Virginia, State of Wisconsin, State of Wyoming,)

) Declaratory and
) Injunctive Relief
) Sought

) Constitutional
) Challenge

) Demand for
) Jury Trial

Defendants.)

Verified Complaint Against Taxpayer-Funded Human Trafficking

Come now Relator-Plaintiffs, Constitutional Association of Parental Rights Advocates (*hereinafter* “CAPRA”), a duly recognized legal association, complaining on matters of overwhelming national interest, and therefore showing this Honorable Court as follows: