

STATE OF NORTH CAROLINA
COUNTY OF MECKLENBURG

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
21-CVS-_____

GUN OWNERS OF AMERICA, INC.,
GUN OWNERS FOUNDATION,
GRASS ROOTS NORTH CAROLINA,
RIGHTS WATCH INTERNATIONAL,
DAVID HODSON, TERRANCE J.
TRAYLOR, AND JORDAN GIBB

Plaintiffs,

v.

SHERIFF GARRY MCFADDEN
(IN HIS OFFICIAL CAPACITY)
SHERIFF OF MECKLENBURG COUNTY
700 E. 4TH ST.
CHARLOTTE, NC 28202 and the
MECKLENBURG COUNTY SHERIFF'S
OFFICE collectively,

Defendant.

**VERIFIED COMPLAINT
and MOTION FOR PRELIMINARY
INJUNCTION**

NOW COMES THE PLAINTIFFS, GUN OWNERS OF AMERICA, INC., GUN OWNERS FOUNDATION, GRASS ROOTS NORTH CAROLINA, RIGHTS WATCH INTERNATIONAL, DAVID HODSON, TERRANCE J. TRAYLOR, and JORDAN GIBB (the "Plaintiffs"), by and through counsel, complaining of the Defendant, SHERIFF GARRY MCFADDEN in his official capacity as the SHERIFF OF MECKLENBURG COUNTY and the MECKLENBURG COUNTY SHERIFF'S OFFICE ("Defendant McFadden"), and alleges as follows:

THE PARTIES

1. Plaintiff Gun Owners of America, Inc. (“GOA”) is a California non-stock corporation with its principal place of business in Virginia at 8001 Forbes Place, Springfield, Virginia 22151. GOA is organized and operated as a non-profit membership organization that is exempt from federal income taxes under Section 501(c)(4) of the Internal Revenue Code. GOA was formed in 1975 to preserve and defend the Second Amendment rights of gun owners. GOA has hundreds of members and supporters who reside in Mecklenburg County, North Carolina who wish to obtain both Pistol Purchase Permits and Concealed Handgun Permits, and who have applied for such permits, but are being irreparably harmed by Sheriff McFadden’s failure to timely issue both types of permits.
2. Plaintiff Gun Owners Foundation (“GOF”) is a Virginia not-for-profit, non-stock corporation, with its principal place of business in Virginia at 8001 Forbes Place, Springfield Virginia 22151. GOF is organized and operated as a non-profit legal defense and educational foundation that is exempt from federal income taxes under section 501(c)(3) of the United States Internal Revenue Code. GOF is supported by gun owners across the country, including residents of North Carolina.
3. Plaintiff Grass Roots North Carolina (“GRNC”) is a North Carolina non-stock corporation with its principal place of business in Raleigh, North Carolina. GRNC is organized and operated as a non-profit membership organization that is exempt from federal income taxes under section 501(c)(4) of the United States Internal Revenue Code. GRNC was formed in 1994 and is dedicated to preserving constitutional freedoms. Most, but not all, of the organization’s projects are devoted to defending the individual right to

keep and bear arms. GRNC has hundreds of members and supporters living in Mecklenburg County, North Carolina.

4. Plaintiff Rights Watch International (“RWI”) is a North Carolina not-for-profit, non-stock corporation, with its principal place of business in Sherrill’s Ford, North Carolina at 4287 Harbor Lane, Sherrills Ford, North Carolina 28673. RWI is organized and operated as a non-profit legal defense and educational foundation that is exempt from federal income taxes under section 501(c)(3) of the United States Internal Revenue Code. RWI is supported by gun owners across the country, including residents of North Carolina within this district.
5. Plaintiff David Hodson is a resident of Mecklenburg County, and a law-abiding person eligible to possess firearms and to obtain a CHP. Plaintiff Hodson is a current member of Grass Roots North Carolina. Plaintiff Hodson completed his concealed carry class on November 12, 2020. He submitted his online application for a CHP with the Sheriff’s office on January 11, 2021, but was not able to obtain an appointment with the Sheriff’s office for fingerprinting until June 1, 2021. After he was fingerprinted, he was advised it would take another four to six months for him to receive his CHP. *See Affidavit and Verification of David Hodson, Exhibit “1.”* The Sheriff’s failure to timely issue Plaintiff Hodson’s CHP is in violation of his right to keep and bear arms and a direct violation of the statutory deadline.
6. Plaintiff Terrance J. Traylor is a resident of Mecklenburg County, and a law-abiding person eligible to possess firearms and to obtain a CHP. He is a member of both Gun Owners of America and Grass Roots North Carolina. Plaintiff Traylor completed his online application with the Sheriff’s office for a CHP in early December 2020. Plaintiff

Traylor searched repeatedly for an appointment with the Sheriff's office for the required fingerprinting. Eventually, his fingerprinting appointment was scheduled for March 17, 2021. As Plaintiff Traylor was leaving his appointment, a deputy told him that he would have to wait 6-7 months to receive his CHP. Upon arriving home, Plaintiff Traylor looked up the timeframe for issuance of a CHP and found that a permit should issue within 45 days of application. Plaintiff Traylor wishes to purchase a handgun for self-defense, and to carry a concealed handgun, but cannot do either because he Sheriff McFadden has not issued his CHP, in violation of Plaintiff Traylor's right to keep and bear arms and in direct violation of the statutory deadline. *See Affidavit and Verification of Terrance J. Traylor, Exhibit "2."*

7. Plaintiff Jordan Gibb is a resident of Mecklenburg County, and a law-abiding person eligible to possess firearms and to obtain a PPP. He is a member of GRNC and GOA. He does not currently own a handgun but would like to obtain one. Plaintiff Gibb does not have a CHP. Plaintiff Gibb applied for a PPP on or about June 20, 2021, but has yet to receive a PPP from the Sheriff. Because of Sheriff McFadden's refusal to timely issue his PPP, Plaintiff Gibb has for months been completely prohibited from obtaining a handgun, in violation of his right to keep and bear arms and in direct violation of the statutory deadline. *See Affidavit and Verification of Jordan Gibb, Exhibit "3."*
8. Defendant Sheriff Garry McFadden is sued in his official capacity as Sheriff of Mecklenburg County, North Carolina, and is the official required by North Carolina law to issue permits to purchase a pistol and concealed handgun permits to qualified applicants in Mecklenburg County, North Carolina.

9. Defendant Mecklenburg County Sheriff's Office ("MCSO") is a separate and distinct legal entity established by the North Carolina Constitution and North Carolina Statutes, and a duly organized police organization within Mecklenburg County, North Carolina.
10. Garry McFadden and the MCSO are referred to collectively/interchangeably as Defendant McFadden/Sheriff/Sheriff's Office.

JURISDICTION AND VENUE

11. This Court has subject matter and personal jurisdiction over this matter and venue is proper in Mecklenburg County Superior Court.

STATEMENT OF FACTS

12. North Carolina law requires that a person wishing to obtain a handgun, even for possession in the home, must first obtain a pistol purchase permit or a concealed handgun permit. N.C.G.S. §14-402.
13. Either a PPP or CHP exempt a prospective purchaser from undergoing an FBI background check at the point of sale. *See* <https://atf.gov/rules-and-regulations/permanent-brady-permit-chart>.
14. Without one of these documents issued by the Sheriff, a law-abiding person is completely unable to obtain a handgun in North Carolina because of the requirement that he obtain government permission and pre-clearance applies to both sales at federally licensed firearms dealers (FFLs) and to sales between private individuals. N.C.G.S. 14-402.
 - a. **Pistol Purchase Permits**
15. North Carolina General Statute §14-403 provides, in pertinent part, that "[t]he sheriffs of any and all counties of this State shall issue to any person, firm, or corporation in any

county a permit to purchase or receive any weapon mentioned in this Article from any person, firm, or corporation offering to sell or dispose of the weapon.”

16. North Carolina General Statute §14-404 states, in pertinent part, that:

[u]pon application, and such application must be provided by the sheriff electronically, the sheriff shall issue the permit to a resident of that county ... when the sheriff has done all of the following:

(1) Verified, before the issuance of a permit, by a criminal history background investigation that it is not a violation of State or federal law for the applicant to purchase, transfer, receive, or possess a handgun. The sheriff shall determine the criminal and background history of any applicant by accessing computerized criminal history records as maintained by the State Bureau of Investigation and the Federal Bureau of Investigation, by conducting a national criminal history records check, by conducting a check through the National Instant Criminal Background Check System (NICS), and by conducting a criminal history check through the Administrative Office of the Courts.

(2) Fully satisfied himself or herself by affidavit, oral evidence, or otherwise, as to the good moral character of the applicant. For purposes of determining an applicant's good moral character to receive a permit, the sheriff shall only consider an applicant's conduct and criminal history for the five-year period immediately preceding the date of the application.

(3) Fully satisfied himself or herself that the applicant desires the possession of the weapon mentioned for (i) the protection of the home, business, person, family or property, (ii) target shooting, (iii) collecting, or (iv) hunting.

17. Pursuant to North Carolina General Statute § 14-404(e)(1), the Sheriff is only allowed to require the following from an applicant for a PPP:

- (1) The permit application developed pursuant to this subsection.
- (2) Five dollars for each permit requested pursuant to subsection € of this section.
- (3) A government issued identification confirming the identity of the applicant.
- (4) Proof of residency.
- (5) A signed release, in a form to be prescribed by the Administrative Office of the Courts, that authorizes and requires disclosure to the sheriff of any court orders concerning the mental health or capacity of the applicant to be used for the sole purpose of determining whether the applicant is disqualified to receive a permit pursuant to this section.

No additional document or evidence shall be required from any applicant.

18. North Carolina General Statute §14-404(i) requires “[a] person or entity” to “promptly disclose to the sheriff, upon presentation by the applicant or sheriff of an original or photocopies release form ... any court orders concerning the mental health or capacity of the applicant who signed the release form.”
19. Subsection (f) of §14-404 states that “[e]ach applicant for a license or permit shall be informed by the sheriff within 14 days of the date of the application whether the license or permit will be granted or denied and, if granted, the license or permit shall be immediately issued to the applicant.”
20. These provisions establish that the Sheriff has fourteen (14) days in which he “shall issue” (under N.C.G.S. §14-403) and “immediately issue” (under N.C.G.S. §14-404) the pistol purchase permit.
21. Upon information and belief, Sheriff McFadden is “processing [PPP] applications received for the week of March 19, 2021, thru March 26, 2021,” which is clearly well beyond the statutory deadlines set forth in §14-404(f) for PPPs.¹
22. Sheriff McFadden’s failure to abide by the statutory deadlines required of him when issuing PPPs constitutes a constructive denial of a PPP to all individuals who have not had their applications processed within the statutorily required deadlines.

¹ <http://www.mecksheriff.com/index.php/gun-permits/> (last accessed August 2, 2021).

23. Defendant McFadden, as the High Sheriff of Mecklenburg County, is the individual responsible for issuing PPPs to residents of Mecklenburg County, North Carolina.

24. No other avenue exists for the residents of Mecklenburg County to obtain a PPP except through Sheriff McFadden.

25. Sheriff McFadden is failing to abide by North Carolina law because he is not issuing PPPs within the statutorily prescribed time limits, and as such, his actions, or failure to act, is unlawful.

26. Plaintiffs are wholly without an adequate remedy at law and have been forced to seek equity and justice in this Court.

b. Concealed Handgun Permit

27. North Carolina law requires that sheriffs “shall issue” concealed handgun permits to those eligible applicants who seek them. N.C.G.S. §14-415.11(b). Concealed handgun permits must be issued or denied within forty-five (45) days of the application and receipt of any necessary mental health records. N.C.G.S. §14-415.15(a). As with PPPs, there is no exception for processing these applications within the statutorily prescribed time frame.

28. Likewise, a sheriff “shall make the request” for such mental health records “within 10 days of receipt” of a completed application, and such records “shall promptly (be) disclose[d] to the sheriff ...” N.C.G.S. §§14-415.15(a); 14-415.14(c).

29. An individual must apply for a CHP with the “sheriff of the county in which the person resides.” N.C.G.S. §14-415.13.

30. Defendant McFadden, as the High Sheriff of Mecklenburg County, is the individual responsible for issuing CHPs to residents of Mecklenburg County, North Carolina.

31. An applicant for a CHP “shall submit” the following to the Sheriff:

- (1) An application, completed under oath, on a form provided by the sheriff, and such application form must be provided by the sheriff electronically. The sheriff shall not request employment information, character affidavits, additional background checks, photographs, or other information unless specifically permitted by this article.
- (2) A non-refundable permit fee.
- (3) A full set of fingerprints of the applicant administered by the sheriff.
- (4) An original certificate of completion of an approved course, adopted and distributed by the North Carolina Criminal Justice Education and Training Standards Commission, signed by the certified instructor of the course attesting to the successful completion of the course by the applicant which shall verify that the applicant is competent with a handgun and knowledgeable about the laws governing the carrying of a concealed handgun and the use of deadly force.
- (5) A release, in a form to be prescribed by the Administrative Office of the Courts, that authorizes and requires disclosure to the sheriff of any records concerning the mental health or capacity of the applicant to be used for the sole purpose of determining whether the applicant is disqualified for a permit under the provisions of G.S. 14-415.12. this provision does not prohibit submitting information related to involuntary commitment to the National Instant Criminal Background Check System (NICS.)

32. Pursuant to N.C.G.S. §14-415.15, “within 45 days after receipt of the items listed in G.S.

14-415.13² from an applicant, and receipt of the required records concerning the mental health or capacity of the applicant, the sheriff shall either issue or deny the permit.”

33. No provision exists under North Carolina law which allow Defendant McFadden to refuse an application, nor to refuse or fail to fingerprint applicants as required under N.C.G.S. §14-415.13.

34. For new CHP applications and renewals, Defendant McFadden’s office states the following³:

New CHP - Applicants should complete the online application and schedule an appointment. At the appointment, the paperwork will be reviewed and notarized, and fingerprints will be taken (*do not apply for a fingerprint appointment*). You will need to bring your paperwork packet, and state issued driver’s license or ID. You will also need

² The application requires a non-refundable fee, full set of fingerprints, certification of completed approved course regarding firearms and mental health records release. N.C.G.S. §14-415.13. N.C.G.S. §14-415.14(c) provides that “[a]ny person or entity who is presented by the applicant or by the sheriff with an original or photocopied release form as described in G.S. §14-415.13(a)(5) shall promptly disclose to the sheriff any records concerning the mental health or capacity of the applicant who signed the form and authorized the release of the records.”

³ <https://mcso.permitium.com/ccw/start> (last accessed August 2, 2021.)

to bring the original safety training certificate, DD-214 if applicable, and proof of citizenship if you were born outside the USA. Once your application has been processed the permit will be mailed to the address you provided on the application. The permit will not be available for pickup.

CHP Renewal – All renewals are completed online, and no appointment is required. Applicants should fill out the online application, print the application packet, sign and have it notarized. Once ALL paperwork is signed and notarized it must be uploaded to the customer’s application using the order tracker link in your submission email. You may also fax to 704-336-6974 or email to mcsogprequests@mecklenburgcountync.gov. Once your application has been completed the permit will be mailed to the address listed on the application. The permit will NOT be available for pick up in the office.

35. For new CHPs, only once an application has been submitted, is a person able to obtain an appointment for fingerprinting. As the Sheriff’s website explains, “Concealed Handgun Permits and Fingerprint services are by appointment only.”⁴

36. No information is available to CHP applicants regarding the length of time required to get a fingerprinting appointment.

37. Upon information and belief, Sheriff McFadden is “processing [CHP] applications received for the week of January 25, 2021 thru January 29, 2021.”⁵

38. No exception exists in the statute for failing to issue or deny a permit within the statutorily prescribed time frame.

39. An individual who does not have a CHP may not carry a concealed handgun in North Carolina. N.C.G.S. §14-415.11.

40. Sheriff McFadden is failing to abide by North Carolina law because he is not issuing CHPs within the time prescribed by State law and, as such, his actions are unlawful.

Allegations

41. Article I, Section 30 of the North Carolina Constitution states that “[a] well-regulated militia being necessary to the security of a free state, the right of the people to keep and

⁴ <https://mecksheriff.com/index.php/gun-permits/> (last accessed August 2, 2021.)

⁵ <http://www.mecksheriff.com/index.php/gun-permits/> (last accessed August 2, 2021).

bear arms shall not be infringed; and, as standing armies in time of peace are dangerous to liberty, they shall not be maintained, and the military shall be kept under strict subordination to, and governed by, the civil power. Nothing herein shall justify the practice of carrying concealed weapons or prevent the General Assembly from enacting penal statutes against that practice.”

42. In North Carolina, “the people” cannot purchase a handgun, what the Supreme Court has called “the quintessential self-defense weapon” (*District of Columbia v. Heller*, 554 U.S. 570, 629, (2008)),⁶ unless they first obtain either a pistol purchase permit or a concealed handgun permit.

43. If “the people” cannot obtain either of these pre-clearance documents from Defendant McFadden, then they cannot “keep and bear arms” as protected by Article I, Section 30.

44. In North Carolina, “the mere act of possessing or carrying a gun in accordance with the law is stringently protected by both the United States and North Carolina Constitutions.” *State v. Huckelba*, 240 N.C. App. 544, 544, 771 S.E.2d 809, 817 (2015.)

45. Defendant McFadden’s custom, policy, and practice of refusing to timely issue pistol purchase permits and concealed handgun permits violates Article I, Section 30 of the North Carolina Constitution because the Sheriff’s actions infringe on the right “of the people” to keep and bear arms, rights that “shall not be infringed.”

46. Additionally, Defendant McFadden is violating North Carolina’s mandatory, non-discretionary timeframes for issuing pistol purchase permits and concealed handgun permits, provided for by statute.

⁶ Due to the similarity of the text of the federal and state constitutional provisions, Plaintiffs’ Complaint seeks relief solely on state law grounds.

47. Plaintiff Gibb, as discussed above, cannot acquire a handgun because he has not been issued a PPP as required by law. Plaintiffs Traylor and Hodson are likewise unable to purchase or conceal carry handguns because the Sheriff has not issued them a CHP within the statutory deadlines.
48. The organizational plaintiffs in this case have heard repeatedly from their members and supporters in Mecklenburg County who have been unable to schedule appointments with Defendant McFadden's office for up to seven months, being told that the earliest appointments are in late August 2021.
49. On the contrary, Sheriff McFadden must accept an application when submitted and cannot avoid his statutory and constitutional duties to accept and process applications and issue or deny permits, by requiring appointments and then refusing to schedule them, making North Carolina's laws mere suggestions rather than statutory mandates. *See* N.C.G.S. §14-404 and §14-415.15.
50. In order to complete the application for a CHP, an applicant must be fingerprinted as required by G.S. § 14-415.13, and fingerprinting services are to be "administered by the sheriff." N.C.G.S. §14-415.13(a)(3). There is no statutory authority for refusing to provide such services by failing to schedule appointments timely, or scheduling appointments months in advance, as these delays undermine the statutory deadlines in which to issue or deny permit applications.
51. Additionally, the appointment system the Sheriff McFadden has adopted for CHP's is not authorized under North Carolina law, and Sheriff McFadden's appointment system only serves to undermine statutory requirements for timely issuance of CHPs.

COUNT I

Violation of North Carolina Law (Writ of Mandamus)

52. Plaintiffs incorporate, adopt, and reallege the previous paragraphs as if set forth again herein.

53. Defendant McFadden has violated and is currently violating North Carolina statutory law by:

- a. Failing to process applications for pistol purchase permit applications in a timely manner;
- b. Failing to issue or deny pistol purchase permits in the timeframe required by North Carolina law;
- c. Failing to accept and process applications for concealed handgun permits in a timely manner;
- d. Failing to issue or deny concealed handgun permits in the timeframe required by North Carolina law;
- e. Failing to accept applications for CHPs without an appointment, in order to avoid his duty to accept and process the applications; and
- f. Failing to fingerprint applicants upon application for a CHP, and instead requiring a separate appointment for fingerprinting services and then failing to allow fingerprint appointments to be booked without waiting an additional number of months.

54. Plaintiffs are being irreparably harmed by Defendant McFadden’s continued violations of state law. The delays in PPP and CHP issuances in Mecklenburg County have been ongoing for well beyond the time frame set forth under North Carolina Statutes, and yet the Sheriff has failed to take adequate steps to address this problem.
55. Defendant’s continued violations of state law should be enjoined, and he should be ordered to conform his actions with state law.
56. North Carolina imposes an official, non-discretionary duty on the Defendant as a matter of law to both accept an application, and to issue permits to qualified applicants within a statutory timeframe.
57. Defendant McFadden does not have to issue permits to those applicants who are *unqualified*, but he “shall issue” to those applicants who *are qualified*. N.C.G.S. §14-415.11(b) and N.C.G.S. §14-403.
58. Plaintiffs have a clear right to the acts requested; Defendant has a legal duty to perform said acts; Defendant has no discretion with which to act in accordance with the mandate of the statutes; Defendant has failed to act and the time for performance has expired; and there is no legally adequate alternative remedy available to the Plaintiffs. *See Morningstar Marinas v. Warren cty.*, 233 N.C. App 23, 27, 755 S.E.2d 75, 78 (2014.)
59. As such, a Writ of Mandamus should issue, directing Defendant to comply with North Carolina state law and timely issue PPPs and CHPs to qualified applicants pursuant to law.

COUNT II

Violation of Article I Section 30 of the North Carolina State Constitution

60. Plaintiffs incorporate, adopt, and reallege the previous paragraphs as if set forth again herein.

61. Defendant McFadden's custom, policy, or practice has deprived Plaintiffs of their constitutional rights to keep and bear arms under Article I, Section 30.

62. Defendant McFadden has infringed on Plaintiff's rights secured by Article I, Section 30 of the North Carolina State Constitution which states, in part "A well-regulated militia being necessary to the security of a free State, the right of the people to keep and bear arms shall not be infringed."

63. Due to Defendant McFadden's actions, Plaintiffs are unable to obtain handguns to keep and use for self-defense, even in their own home.

COUNT III

Declaratory Judgment Pursuant to N.C.G.S. § 1-253 *et seq.*

64. Plaintiffs incorporate, adopt, and reallege the previous paragraphs as if set forth again herein.

65. Plaintiffs seek a declaratory judgment pursuant to North Carolina General Statutes Article 26 §1-253 *et seq.* for the purpose of determining the rights, status and legal relations of the parties.

66. An actual controversy of a justiciable issue between the parties exists.

67. Plaintiffs have been adversely and directly affected by Defendant McFadden's failure to properly follow North Carolina statutes and Constitutional mandates.

68. The Plaintiffs, at a minimum, are entitled to a declaratory judgment stating that:

- a. Defendant McFadden should do the following pursuant to N.C.G.S. §14-403 *et seq.* and N.C.G.S. § 14-404 *et seq.*: Issue or deny PPP's within 14 days and then issue permits immediately thereafter.
- b. Defendant McFadden has failed to follow the provisions of N.C.G.S. § 14-403 *et seq.* & N.C.G.S. § 14-404 *et seq.* and has violated Plaintiffs' North Carolina Constitutional rights.
- c. Defendant McFadden should do the following pursuant to N.C.G.S. §14-415.15: "within 45 days after receipt of the items listed in G.S. 14-415.13⁷ from an applicant, and receipt of the required records concerning the mental health or capacity of the applicant, the sheriff shall either issue or deny the permit."
- d. Defendant McFadden has failed to follow the provisions of N.C.G.S. § 14-415.15 *et seq.* and has violated Plaintiffs' North Carolina Constitutional rights.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff's request that judgement be entered in their favor and against Defendant as follows:

- a. Declaratory Judgment that Defendant McFadden's actions violate State law and Plaintiffs' rights secured by the North Carolina Constitution.
- b. The issuance of a preliminary injunction, enjoining Defendant, his officers, agents, servants, employees, and all persons in active concert or participation with them who receive actual notice of the injunction from continuing to violate State law and the Plaintiff's rights secured the North Carolina Constitution;

⁷ The application requires a non-refundable fee, full set of fingerprints, certification of completed approved course regarding firearms and mental health records release. N.C.G.S. §14-415.13. N.C.G.S. §14-415.14(c) provides that "[a]ny person or entity who is presented by the applicant or by the sheriff with an original or photocopied release form as described in G.S. §14-415.13(a)(5) shall promptly disclose to the sheriff any records concerning the mental health or capacity of the applicant who signed the form and authorized the release of the records."

- c. A Writ of Mandamus to issue against Defendant McFadden, ordering that he comply with the statutory requirements of North Carolina state law and that he “shall issue” both PPP and CHP permits to qualified applicants;
- d. The costs of this suit, including Plaintiffs’ attorneys’ fees and costs;
- e. Nominal damages;
- f. Such other relief consistent with the declaratory Judgment as appropriate;
- g. For a jury trial on any and all issues so triable.
- h. Such other relief consistent with the injunction as appropriate; and
- i. Such other further relief that this Court deems just and proper.

Respectfully submitted this ____ day of August, 2021.

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EXHIBIT 1

EXHIBIT 2

EXHIBIT 3

EXHIBIT 4