

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION

CASE NO. 19-CV-62591-BLOOM/VALLE

EGLISE BAPTISTE BETHANIE DE
FT. LAUDERDALE, INC., a Florida
Not-For-Profit Corporation, BERTHONY
AURELUS, YCHELINDE BRUTUS,
MARIANA BELIZAIRE, JARMUTH CHARLES,
QUESNER CHARLES, ELISENA CHARLOT,
ROSENA CELESTIN, SERAPHIN D’HAITI,
MAX DEMOSTHENE, MARIE DEMOSTHENE,
CLAIRE VALERIE DESTIN, ROSELIE
DOCTEUR, EMMANUEL DUVERNA,
MAX DUBOIS, WISNICK ESTELAN,
MAJORIE ESTELAN, ALINE SUZAN
FRANCOIS, MADELENE PIERRE GEDILUS,
NEREUS GEDILUS, GESLER ILSENAT,
MICHAEL ISEMAR, JEAN ISMAEL, JULIANNA
ISMAEL, BEZANA JEAN-BAPTISTE, GERTHA
JEAN-BAPTISTE, IRMA JEUDY, FLORENCE
JOLY, ERTA JOSEPH, HORAT JOSEPH, JOSETTE
JOSEPH, JULIA LAFRANCE, EPHISELLA MENAR,
GEORGE MENAR, MISELA MERONVIL, ESAIE
MICHEL, GERTHA MICHEL, ROSITA
MILHOMME, NICOLAS MOISE, LUTHANE MOISE,
LOUISE MUNNINGS, EMILE NOEL, FLORENCE
NOEL, ZIUS NOEL, DUMARSAIS PARFAIT,
HERTHA PARFAIT, CLAUDETTE PIERRE,
HERMANIE PIERRE, JEAN LOUIS PIERRELUS,
FENELON PROSPER, BONIFACE PETIT-BEAU,
BARCELOT PETIT-BEAU, LYDIEUNIE PETIT-
BEAU, VERDELINE PETIT-BEAU, KELDY
DENITA PIERRE, LINES PIERRE, LAVITA
PIERRE, ANEILA PIERRE-LOUIS, FANA RACINE,
MIRLANDE RACINE, JACKSON ROBERSON,
SOLANGE ROBERSON, ALIANE SAINTIL,
LUCKERNE SAINTIL, HERMANTILDE
SAINTIL, MARIE SANTIL, JEAN SOLVILIEN,
MUREGNE ST-LOUIS, ANDY SAINT-REMY,

ACCELINE SAINT-REMY, LEONNE SAINT-REMY, JOSEPH SYLVAIN, BIENNE TANIS, LUCIA TANIS, ITONY TELUSNORD, MARIE ANGELET TELUSNORD, DIENIVA THERVIL, and LUDIE THERVIL,

Plaintiffs,

v.

THE SEMINOLE TRIBE OF FLORIDA and AIDA AUGUSTE,

Defendants.

_____ /

FIRST AMENDED COMPLAINT/JURY TRIAL DEMANDED
(Fla. Bar No. 133162)

Plaintiffs sue Defendants The Seminole Tribe Of Florida (“SemTribe”) and Aida Auguste (“Auguste”) and allege:

SUBJECT-MATTER JURISDICTION

1. This is a civil action for damages under 18 U.S.C. § 248(c)(1)¹ (Counts 1 and 4-

¹ Section 248, Title 18, United States Code, is entitled *Freedom of access to clinic entrances*. In pertinent part, it provides:

(a) Prohibited activities- Whoever-

* * * * *

(2) by force or threat of force or by physical obstruction, intentionally injures, intimidates or interferes with or or attempts to injure, intimidate or interfere with any person lawfully exercising or

83) for which subject-matter jurisdiction exists by virtue of 28 U.S.C. §§ 1331 and 1343(a).

seeking to exercise the First Amendment right of religious freedom at a place of religious worship;

* * * * *

Shall be subject to the penalties provided in subsection (b) and the civil remedies provided in subsection (c), except that a person or legal guardian of a minor shall not be subject to any penalties or civil remedies under this section for such activities insofar as they are directed exclusively at that minor.

* * * * *

(c) Civil remedies-

(1) Rights of action-

(A) In general.- Any person aggrieved by reason of the conduct prohibited by subsection (a) may commence a civil action for the relief set forth in subparagraph (B)... and such an action may be brought under subsection (a)(2) only by a person lawfully exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship or by the entity that owns or operates such place of religious worship.

(B) Relief.- In any action under subparagraph (A), the court may award appropriate relief, including temporary, preliminary or permanent injunctive relief and compensatory and punitive damages, as well as the costs of suit and reasonable fees for attorneys and expert witnesses. With respect to compensatory damages, the plaintiff may elect, at any time prior to the rendering of final judgment, to recover, in lieu of actual damages, an award of statutory damages in the amount of \$5,000 per violation.

In addition, this is a civil action for damages for interference with business relationships (Count 2) and trespass (Count 3), for which supplemental subject-matter jurisdiction exists by virtue of 28 U.S.C. § 1367.

EGLISE BAPTISTE

2. Eglise Baptiste is (a) a Florida not-for-profit corporation, (b) a Haitian Baptist church and (c) affiliated with the Southern Baptist Convention. It adheres to the congregationalist mode of Christian church governance. Eglise Baptiste's principal place of business is located at 2200 N.W. 12th Avenue, Fort Lauderdale, Broward County, Florida 33311, and it possesses fee simple title to the approximately ten (10) acres of improved real property commonly known by the foregoing address and bearing Tax Identification Number 4942-28-32-0010 ("the Church Property"). The Church Property is located 11.1 miles from SemTribe's reservation in Hollywood, Florida.

THE DEFENDANTS

3. SemTribe is a Native American tribe which has been recognized by the United States Department of the Interior pursuant to 25 U.S.C. § 5123. The Supreme Court of the United States has characterized the several Native American tribes, including SemTribe, as "dependent domestic sovereigns". SemTribe owns and maintains a reservation in Hollywood, Florida, and is governed by a Tribal Council, which is established by the Constitution And Bylaws of SemTribe. The Seminole Police Department ("the SPD") is an agency of SemTribe and operates under the supervision of the Tribal Council.

4. Auguste is a resident of Broward County, Florida. She is not subject to any legal disabilities.

VENUE

5. The venue of this civil action is properly laid in the Southern District of Florida because (a) SemTribe's principal place of business is located in that District, (b) Auguste resides in that District and (c) Plaintiffs' causes of action arise in that District.

CONDITIONS PRECEDENT

6. All conditions precedent to the commencement and prosecution to final judgment of this civil action have taken place, have been performed or have been waived or excused by SemTribe and Auguste.

THE FACTS

7. Prior to his death on July 26, 2014, the Pastor of Eglise Baptise was the Rev. Uslar Auguste ("Pastor Auguste"). Since then, the Board of Directors of Eglise Baptiste and Auguste (the widow of Pastor Auguste) have contended for the leadership of Eglise Baptiste.

8. On Sunday, September 22, 2019, a meeting of the congregation of Eglise Baptiste was convened for the purpose of approving a process for the selection and installation of a successor to the late Pastor Auguste. Despite the peacemaking efforts of a mediator assigned to Eglise Baptiste by an affiliate of the Southern Baptist Convention, the September 22, 2019, congregational meeting devolved into a pushing, shoving and punching affair between the supporters of the Board of Directors and the supporters of Auguste. The Fort Lauderdale

Police Department was summoned and its officers helped to restore order.

9. Eglise Baptiste, on September 24, 2019, filed a civil action for declaratory and injunctive relief against Auguste and her supporters in the Circuit Civil Division, Seventeenth Circuit Court, Broward County, Florida, which came to be styled *Eglise Baptiste Bethanie De Ft. Lauderdale, Inc. v. Aida Auguste, et al.*, Case No. CACE-19-19270 (4) ("Case No. 19-19270"). Undersigned counsel for Plaintiffs in this action commenced and continues to represent Eglise Baptiste in Case No. 19-19270.

10. On Sunday morning, September 29, 2019, Eglise Baptiste conducted its weekly Sabbath services in the religious structure located on the Church Property. While those services were in progress, Auguste and her supporters, escorted by six (6) armed (with SPD-issued handguns) officers wearing SPD uniforms (who had traveled from SemTribe's reservation in two vehicles, one of them an SPD marked squad car),² without judicial or other valid authorization: (a) entered the Church Property, (b) disabled the Church Property's surveillance cameras (c) expelled from the Church Property all the worshipers who opposed Auguste, (d) changed the locks to the doors of the religious structure located on the Church Property, (e) seized the business records of Eglise Baptiste and (f) locked the gates to the Church Property. Auguste and her supporters continue to occupy the Church Property to the

² Because SemTribe's personal property was used by the SPD officers who entered the Church Property on September 29, 2019, SemTribe should be held vicariously liable in compensatory and punitive damages to Plaintiffs. *See, K.M. ex rel. D.M. v. Publix Super Markets, Inc.*, 895 So. 2d 1114 (Fla. 4th DCA 2005).

exclusion of Plaintiffs and to control Eglise Baptiste's personal property, including Eglise Baptiste's bank accounts.

11. The judicial doctrine of tribal sovereign immunity does not insulate SemTribe from the claims which Plaintiffs have asserted against SemTribe in this civil action because: (a) the actions of SemTribe's police officers took place more than eleven (11) miles from SemTribe's Hollywood, Florida, reservation, (b) prior to September 29, 2019, Plaintiffs had not had an opportunity to negotiate with SemTribe for a waiver of SemTribe's tribal sovereign immunity; and (c) other than through this civil action, Plaintiffs have no means by which to secure monetary compensation for SemTribe's infringements of Plaintiffs' rights under Federal and Florida law.

PLAINTIFFS' CLAIMS FOR RELIEF

Count 1-Eglise Baptiste v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Eglise Baptiste sues SemTribe and Auguste and alleges:

12. Eglise Baptiste realleges and incorporates by reference the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

13. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Eglise Baptiste's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

14. Eglise Baptiste has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Eglise Baptiste has obligated itself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

15. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Eglise Baptiste has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Eglise Baptiste is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Eglise Baptiste demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Eglise Baptiste the costs of this civil action, attorneys' fees and expert witness fees.

Count 2- Eglise Baptiste v. SemTribe- Interference With Business Relationships

Eglise Baptiste sues SemTribe and alleges:

16. Eglise Baptiste realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

17. SemTribe, with a bad motive and without justification, improperly and intentionally interfered with Eglise Baptiste's business relationships with its members when SemTribe engaged in the conduct set forth in ¶ 10 of this First Amended Complaint.

18. As the proximate result of the foregoing interference, Eglise Baptiste has suffered an injury in its business and property for which injury it is entitled to recover compensatory and punitive damages from SemTribe.

Wherefore, Eglise Baptiste respectfully requests that the Court enter a final judgment for compensatory and punitive damages in its favor and against SemTribe, plus the costs of this civil action.

Count 3- Eglise Baptiste v. SemTribe- Trespass

Eglise Baptiste sues SemTribe and alleges:

19. Eglise Baptiste realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

20. SemTribe, without judicial or other valid authorization, entered on and, to the exclusion of Eglise Baptiste, seized the Church Property and thereby committed a trespass.

21. As the proximate result of the conduct set forth in ¶¶ 10 of this First Amended Complaint, Eglise Baptiste has sustained an injury in its business and property for which injury it is entitled to recover compensatory damages from SemTribe.

Wherefore, Eglise Baptiste respectfully requests that the Court enter a final judgment for damages in its favor and against SemTribe, plus the costs of this civil action.

Count 4-Berthony Aurelus v. SemTribe and Auguste/18 U.S.C. § 248(a)(2)

Plaintiff Berthony Aurelus sues SemTribe and Auguste and alleges:

22. Plaintiff Berthony Aurelus realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

23. Plaintiff Berthony Aurelus (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

23. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Berthony Aurelus's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

25. Plaintiff Berthony Aurelus has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Berthony Aurelus has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

26. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Berthony Aurelus has sustained injuries and losses for which,

pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Berthony Aurelus is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Berthony Aurelus demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Berthony Aurelus the costs of this civil action, attorneys' fees and expert witness fees.

Count 5- Ychelinde Brutus v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Ychelinde Brutus sues SemTribe and Auguste and alleges:

27. Plaintiff Ychelinde Brutus realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

28. Plaintiff Ychelinde Brutus (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

29. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Ychelinde Brutus's exercising or seeking to exercise the

First Amendment right of religious freedom at a place of religious worship.

30. Plaintiff Ychelinde Brutus has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Ychelinde Brutus has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

31. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Ychelinde Brutus has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Ychelinde Brutus is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Ychelinde Brutus demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Ychelinde Brutus the costs of this civil action, attorneys' fees and expert witness fees.

Count 6- Mariana Belizaire v. SemTribe and Auguste/18 U.S.C. § 241(c)(1)

Plaintiff Mariana Belizaire sues SemTribe and Auguste and alleges:

32. Plaintiff Mariana Belizaire realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

33. Plaintiff Mariana Belizaire (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

34. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Mariana Belizaire's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

35. Plaintiff Mariana Belizaire has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Mariana Belizaire has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

36. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Mariana Belizaire has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Mariana Belizaire is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil

action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Mariana Belizaire demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Mariana Belizaire the costs of this civil action, attorneys' fees and expert witness fees.

Count 7- Jarmuth Charles v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Jarmuth Charles sues SemTribe and Auguste and alleges:

37. Plaintiff Jarmuth Charles realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

38. Plaintiff Jarmuth Charles (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

39. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Jarmuth Charles's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

40. Plaintiff Jarmuth Charles has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Jarmuth Charles has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

41. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Jarmuth Charles has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Jarmuth Charles is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Jarmuth Charles demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Jarmuth Charles the costs of this civil action, attorneys' fees and expert witness fees.

Count 8- Quesner Charles v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Quesner Charles sues SemTribe and Auguste and alleges:

42. Plaintiff Quesner Charles realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

43. Plaintiff Quesner Charles (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the

September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

44. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Quesner Charles's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

45. Plaintiff Quesner Charles has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Quesner Charles has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

46. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Quesner Charles has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Quesner Charles is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Quesner Charles demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Quesner Charles the costs of this civil action, attorneys' fees and expert witness fees.

Count 9- Elisena Charlot v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Elisena Charlot sues SemTribe and Auguste and alleges:

47. Plaintiff Elisena Charlot realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

48. Plaintiff Elisena Charlot (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

49. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Elisena Charlot's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

50. Plaintiff Elisena Charlot has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Elisena Charlot has obligated

himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

51. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Elisena Charlot has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Elisena Charlot is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Elisena Charlot demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Elisena Charlot the costs of this civil action, attorneys' fees and expert witness fees.

Count 10- Rosena Celestin v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Rosena Celestin sues SemTribe and Auguste and alleges:

52. Plaintiff Rosena Celestin realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

53. Plaintiff Rosena Celestin (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

54. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Rosena Celestin's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

55. Plaintiff Rosena Celestin has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Rosena Celestin has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

56. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Rosena Celestin has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Rosena Celestin is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Rosena Celestin demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Rosena Celestin the costs of this civil action, attorneys' fees and expert witness fees.

Count 11-Seraphin D'Haiti v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Seraphin D'Haiti sues SemTribe and Auguste and alleges:

57. Plaintiff Seraphin D'Haiti realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

58. Plaintiff Seraphin D'Haiti (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

59. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Seraphin D'Haiti's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

60. Plaintiff Seraphin D'Haiti has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Seraphin D'Haiti has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

61. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Seraphine D'Haiti has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Seraphin D'Haiti is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Seraphin D'Haiti demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Seraphin D'Haiti the costs of this civil action, attorneys' fees and expert witness fees.

Count 12- Max Demosthene v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Max Demosthene sues SemTribe and Auguste and alleges:

62. Plaintiff Max Demosthene realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

63. Plaintiff Max Demosthene (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

64. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical

obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Max Demosthene's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

65. Plaintiff Max Demosthene has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Max Demosthene has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

66. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Max Demosthene has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Max Demosthene is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Max Demosthene demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Max Demosthene the costs of this civil action, attorneys' fees and expert witness fees.

Count 13- Marie Demosthene v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Marie Demosthene sues SemTribe and Auguste and alleges:

67. Plaintiff Marie Demosthene realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

68. Plaintiff Marie Demosthene (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

69. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Marie Demosthene's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

70. Plaintiff Marie Demosthene has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Marie Demosthene has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

71. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Marie Demosthene has sustained injuries and losses for which,

pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Marie Demosthene is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Marie Demosthene demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Marie Demosthene the costs of this civil action, attorneys' fees and expert witness fees.

Count 14-Claire Valerie Destin v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Claire Valerie Destin sues SemTribe and Auguste and alleges:

72. Plaintiff Claire Valerie Destin realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

73. Plaintiff Claire Valerie Destin (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

74. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Claire Valerie Destin's exercising or seeking to exercise

the First Amendment right of religious freedom at a place of religious worship.

75. Plaintiff Claire Valerie Destin has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Claire Valerie Destin has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

76. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Claire Valerie Destin has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Claire Valerie Destin is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Claire Valerie Destin demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Claire Valerie Destin the costs of this civil action, attorneys' fees and expert witness fees.

Count 15- Roselie Docteur v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Roselie Docteur sues SemTribe and Auguste and alleges:

77. Plaintiff Roselie Docteur realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

78. Plaintiff Roselie Docteur (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

79. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Roselie Docteur's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

80. Plaintiff Roselie Docteur has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Roselie Docteur has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

81. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Roselie Docteur has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Roselie Docteur is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil

action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Roselie Docteur demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Roselie Docteur the costs of this civil action, attorneys' fees and expert witness fees.

Count 16- Emmanuel Duverna v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Emmanuel Duverna sues SemTribe and Auguste and alleges:

82. Plaintiff Emmanuel Duverna realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

83. Plaintiff Emmanuel Duverna (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

84. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Emmanuel Duverna's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

85. Plaintiff Emmanuel Duverna has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to

final judgment this civil action. In that regard, Plaintiff Emmanuel Duverna has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

86. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Emmanuel Duverna has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Emmanuel Duverna is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Emmanuel Duverna demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Emmanuel Duverna the costs of this civil action, attorneys' fees and expert witness fees.

Count 17-Max Dubois v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Max Dubois sues SemTribe and Auguste and alleges:

87. Plaintiff Max Dubois realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

88. Plaintiff Max Dubois (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church

Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

89. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Max Dubois's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

90. Plaintiff Max Dubois has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Max Dubois has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

91. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Max Dubois has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Max Dubois is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Max Dubois demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Max Dubois the costs of this civil action, attorneys' fees and expert witness fees.

Count 18- Wisnick Estelan v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Wisnick Estelan sues SemTribe and Auguste and alleges:

92. Plaintiff Max Dubois realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

93. Plaintiff Wisnick Estelan (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

94. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Wisnick Estelan's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

95. Plaintiff Wisnick Estelan has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Wisnick Estelan has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

96. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Wisnick Estelan has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Wisnick Estelan is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Wisnick Estelan demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Wisnick Estelan the costs of this civil action, attorneys' fees and expert witness fees.

Count 19- Majorie Estelan v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Majorie Estelan sues SemTribe and Auguste and alleges:

97. Plaintiff Majorie Estelan realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

98. Plaintiff Majorie Estelan (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

99. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure,

intimidate or interfere with Plaintiff Majorie Estelan's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

100. Plaintiff Majorie Estelan has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Majorie Estelan has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

101. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Majorie Estelan has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Majorie Estelan is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Majorie Estelan demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Majorie Estelan the costs of this civil action, attorneys' fees and expert witness fees.

Count 20- Aline Suzan Francois v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Aline Suzan Francois sues SemTribe and Auguste and alleges:

102. Plaintiff Aline Suzan Francois realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

103. Plaintiff Aline Suzan Francois (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

104. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Aline Suzan Francois's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

105. Plaintiff Aline Suzan Francois has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Aline Suzan Francois has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

106. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Aline Suzan Francois has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Aline Suzan Francois is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil

action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Aline Suzan Francois demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Aline Suzan Francois the costs of this civil action, attorneys' fees and expert witness fees.

Count 21- Madeline Pierre Gedilus v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Madeline Pierre Gedilus sues SemTribe and Auguste and alleges:

107. Plaintiff Madeline Pierre Gedilus realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

108. Plaintiff Madeline Pierre Gedilus (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

109. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Madeline Pierre Gedilus's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

110. Plaintiff Madeline Pierre Gedilus has been compelled to engage the professional

services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Madeline Pierre Gedilus has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

111. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Madeline Pierre Gedilus has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Madeline Pierre Gedilus is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Madeline Pierre Gedilus demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Madeline Pierre Gedilus the costs of this civil action, attorneys' fees and expert witness fees.

Count 22- Nereus Gedilus v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Nereus Gedilus sues SemTribe and Auguste and alleges:

112. Plaintiff Nereus Gedilus realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

113. Plaintiff Nereus Gedilus (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the

September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

114. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Nereus Gedilus's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

115. Plaintiff Nereus Gedilus has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Nereus Gedilus has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

116. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Nereus Gedilus has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Nereus Gedilus is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Nereus Gedilus demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Nereus Gedilus the costs of this civil action, attorneys' fees and expert witness fees.

Count 23- Gesler Ilsenat v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Gesler Ilsenat sues SemTribe and Auguste and alleges:

117. Plaintiff Gesler Ilsenat realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

118. Plaintiff Gesler Ilsenat (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

119. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Gesler Ilsenat's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

120. Plaintiff Gesler Ilsenat has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Gesler Ilsenat has obligated

himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

121. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Gesler Ilsenat has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Gesler Ilsenat is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Gesler Ilsenat demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Gesler Ilsenat the costs of this civil action, attorneys' fees and expert witness fees.

Count 24- Michael Isemar v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Michael Isemar sues SemTribe and Auguste and alleges:

122. Plaintiff Michael Isemar realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

123. Plaintiff Michael Isemar (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

124. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Michael Isemar's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

125. Plaintiff Michael Isemar has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Michael Isemar has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

126. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Michael Isemar has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Michael Isemar is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Michael Isemar demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Michael Isemar the costs of this civil action, attorneys' fees and expert witness fees.

Count 25- Jean Ismael v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Jean Ismael sues SemTribe and Auguste and alleges:

127. Plaintiff Jean Ismael realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

128. Plaintiff Jean Ismael (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

129. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Jean Ismael's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

130. Plaintiff Jean Ismael has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Jean Ismael has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

131. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Jean Ismael has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Jean Ismael is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Jean Ismael demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Jean Ismael the costs of this civil action, attorneys' fees and expert witness fees.

Count 26- Julianna Ismael v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Julianna Ismael sues SemTribe and Auguste and alleges:

132. Plaintiff Julianna Ismael realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

133. Plaintiff Julianna Ismael (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

134. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure,

intimidate or interfere with Plaintiff Julianna Ismael's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

135. Plaintiff Julianna Ismael has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Julianna Ismael has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

136. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Julianna Ismael has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Julianna Ismael is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Julianna Ismael demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Julianna Ismael the costs of this civil action, attorneys' fees and expert witness fees.

Count 27- Bezana Jean-Baptiste v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Bezana Jean-Baptiste sues SemTribe and Auguste and alleges:

137. Plaintiff Bezana Jean-Baptiste realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

138. Plaintiff Bezana Jean-Baptiste (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

139. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Bezana Jean-Baptiste's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

140. Plaintiff Bezana Jean-Baptiste has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Bezana Jean-Baptiste has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

141. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Bezana Jean-Baptiste has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Bezana Jean-Baptiste is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil

action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Bezana Jean-Baptiste demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Bezana Jean-Baptiste the costs of this civil action, attorneys' fees and expert witness fees.

Count 28- Gertha Jean-Baptiste v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Gertha Jean-Baptiste sues SemTribe and Auguste and alleges:

142. Plaintiff Gertha Jean-Baptiste realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

143. Plaintiff Gertha Jean-Baptiste (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

144. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Gertha Jean-Baptiste's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

145. Plaintiff Gertha Jean-Baptiste has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Gertha Jean-Baptiste has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

146. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Gertha Jean-Baptiste has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Gertha Jean-Baptiste is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Gertha Jean-Baptiste demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Gertha Jean-Baptiste the costs of this civil action, attorneys' fees and expert witness fees.

Count 29- Irma Jeudy v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Irma Jeudy sues SemTribe and Auguste and alleges:

147. Plaintiff Irma Jeudy realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

148. Plaintiff Irma Jeudy (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

149. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Irma Jeudy's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

150. Plaintiff Irma Jeudy has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Irma Jeudy has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

151. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Irma Jeudy has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Irma Jeudy is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Irma Jeudy demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Irma Jeudy the costs of this civil action, attorneys' fees and expert witness fees.

Count 30- Florence Joly v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Florence Joly sues SemTribe and Auguste and alleges:

152. Plaintiff Florence Joly realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

153. Plaintiff Florence Joly (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

154. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Florence Joly's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

155. Plaintiff Florence Joly has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Florence Joly has obligated

himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

156. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Florence Joly has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Florence Joly is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Florence Joly demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Florence Joly the costs of this civil action, attorneys' fees and expert witness fees.

Count 31- Erta Joseph v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Erta Joseph sues SemTribe and Auguste and alleges:

157. Plaintiff Erta Joseph realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

158. Plaintiff Erta Joseph (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

159. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Erta Joseph's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

160. Plaintiff Erta Joseph has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Erta Joseph has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

161. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Erta Joseph has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Erta Joseph is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Erta Joseph demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Erta Joseph the costs of this civil action, attorneys' fees and expert witness fees.

Count 32- Horat Joseph v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Horat Joseph sues SemTribe and Auguste and alleges:

162. Plaintiff Horat Joseph realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

163. Plaintiff Horat Joseph (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

164. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Horat Joseph's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

165. Plaintiff Horat Joseph has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Horat Joseph has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

166. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Horat Joseph has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Horat Joseph is entitled to recover from

SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Horat Joseph demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Horat Joseph the costs of this civil action, attorneys' fees and expert witness fees.

Count 33- Josette Joseph v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Josette Joseph sues SemTribe and Auguste and alleges:

167. Plaintiff Josette Joseph realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

168. Plaintiff Josette Joseph (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

169. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Josette Joseph's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

170. Plaintiff Josette Joseph has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Josette Joseph has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

171. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Josette Joseph has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Josette Joseph is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Josette Joseph demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Josette Joseph the costs of this civil action, attorneys' fees and expert witness fees.

Count 34- Julia Lafrance v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Julia Lafrance sues SemTribe and Auguste and alleges:

172. Plaintiff Julia Lafrance realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

173. Plaintiff Julia Lafrance (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the

September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

174. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Julia Lafrance's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

175. Plaintiff Julia Lafrance has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Julia Lafrance has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

176. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Julia Lafrance has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Julia Lafrance is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Julia Lafrance demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Julia Lafrance the costs of this civil action, attorneys' fees and expert witness fees.

Count 35- Ephisella Menar v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Ephisella Menar sues SemTribe and Auguste and alleges:

177. Plaintiff Ephisella Menar realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

178. Plaintiff Ephisella Menar (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

179. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Ephisella Menar's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

180. Plaintiff Ephisella Menar has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Ephisella Menar has obligated

himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

181. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Ephisella Menar has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Ephisella Menar is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Ephisella Menar demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Ephisella Menar the costs of this civil action, attorneys' fees and expert witness fees.

Count 36- George Menar v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff George Menar sues SemTribe and Auguste and alleges:

182. Plaintiff George Menar realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

183. Plaintiff George Menar (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

184. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff George Menar's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

185. Plaintiff George Menar has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff George Menar has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

186. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff George Menar has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff George Menar is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff George Menar demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff George Menar the costs of this civil action, attorneys' fees and expert witness fees.

Count 37- Misela Meronvil v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Misela Meronvil sues SemTribe and Auguste and alleges:

187. Plaintiff Misela Meronvil realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

188. Plaintiff Misela Meronvil (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

189. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Misela Meronvil's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

190. Plaintiff Misela Meronvil has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Misela Meronvil has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

191. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Misela Meronvil has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Misela Meronvil is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Misela Meronvil demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Misela Meronvil the costs of this civil action, attorneys' fees and expert witness fees.

Count 38- Esaie Michel v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Esaie Michel sues SemTribe and Auguste and alleges:

192. Plaintiff Esaie Michel realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

193. Plaintiff Esaie Michel (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

194. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical

obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Esaie Michel's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

195. Plaintiff Esaie Michel has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Esaie Michel has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

196. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Esaie Michel has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Esaie Michel is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Esaie Michel demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Esaie Michel the costs of this civil action, attorneys' fees and expert witness fees.

Count 39- Gertha Michel v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Gertha Michel sues SemTribe and Auguste and alleges:

197. Plaintiff Gertha Michel realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

198. Plaintiff Gertha Michel (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

199. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Gertha Michel's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

200. Plaintiff Gertha Michel has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Gertha Michel has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

201. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Gertha Michel has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Gertha Michel is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil

action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Gertha Michel demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Gertha Michel the costs of this civil action, attorneys' fees and expert witness fees.

Count 40- Rosita Milhomme v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Rosita Milhomme sues SemTribe and Auguste and alleges:

202. Plaintiff Rosita Milhomme realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

203. Plaintiff Rosita Milhomme (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

204. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Rosita Milhomme's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

205. Plaintiff Rosita Milhomme has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to

final judgment this civil action. In that regard, Plaintiff Rosita Milhomme has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

206. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Rosita Milhomme has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Rosita Milhomme is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Rosita Milhomme demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Rosita Milhomme the costs of this civil action, attorneys' fees and expert witness fees.

Count 41- Nicholas Moise v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Nicholas Moise sues SemTribe and Auguste and alleges:

207. Plaintiff Nicholas Moise realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

208. Plaintiff Nicholas Moise (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church

Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

209. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Nicholas Moise's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

210. Plaintiff Nicholas Moise has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Nicholas Moise has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

211. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Nicholas Moise has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Nicholas Moise is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Nicholas Moise demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff

Nicholas Moise the costs of this civil action, attorneys' fees and expert witness fees.

Count 42- Luthane Moise v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Luthane Moise sues SemTribe and Auguste and alleges:

212. Plaintiff Luthane Moise realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

213. Plaintiff Luthane Moise (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

214. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Luthane Moise's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

215. Plaintiff Luthane Moise has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Luthane Moise has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution

of this civil action.

216. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Luthane Moise has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Luthane Moise is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Luthane Moise demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Luthane Moise the costs of this civil action, attorneys' fees and expert witness fees.

Count 43- Louise Munnings v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Louise Munnings sues SemTribe and Auguste and alleges:

217. Plaintiff Louise Munnings realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

218. Plaintiff Louise Munnings (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

219. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical

obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Louise Munnings's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

220. Plaintiff Louise Munnings has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Louise Munnings has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

221. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Louise Munnings has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Louise Munnings is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Louise Munnings demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Louise Munnings the costs of this civil action, attorneys' fees and expert witness fees.

Count 44- Emile Noel v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Emile Noel sues SemTribe and Auguste and alleges:

222. Plaintiff Emile Noel realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

223. Plaintiff Emile Noel (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

224. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Emile Noel's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

225. Plaintiff Emile Noel has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Emile Noel has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

226. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Emile Noel has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Emile Noel is entitled to recover from SemTribe

and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Emile Noel demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Emile Noel the costs of this civil action, attorneys' fees and expert witness fees.

Count 45- Florence Noel v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Florence Noel sues SemTribe and Auguste and alleges:

227. Plaintiff Florence Noel realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

228. Plaintiff Florence Noel (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

229. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Florence Noel's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

230. Plaintiff Florence Noel has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Florence Noel has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

231. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Florence Noel has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Florence Noel is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Florence Noel demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Florence Noel the costs of this civil action, attorneys' fees and expert witness fees.

Count 46- Zius Noel v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Zius Noel sues SemTribe and Auguste and alleges:

232. Plaintiff Zius Noel realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

233. Plaintiff Zius Noel (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29,

2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

234. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Zius Noel's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

235. Plaintiff Zius Noel has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Zius Noel has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

236. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Zius Noel has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Zius Noel is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Zius Noel demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Zius

Noel the costs of this civil action, attorneys' fees and expert witness fees.

Count 47- Dumarsais Parfait v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Dumarsais Parfait sues SemTribe and Auguste and alleges:

237. Plaintiff Dumarsais Parfait realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

238. Plaintiff Dumarsais Parfait (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

239. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Dumarsais Parfait's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

240. Plaintiff Dumarsais Parfait has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Dumarsais Parfait has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution

of this civil action.

241. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Dumarsais Parfait has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Dumarsais Parfait is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Dumarsais Parfait demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Dumarsais Parfait the costs of this civil action, attorneys' fees and expert witness fees.

Count 48- Hertha Parfait v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Hertha Parfait sues SemTribe and Auguste and alleges:

242. Plaintiff Hertha Parfait realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

243. Plaintiff Hertha Parfait (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

244. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Hertha Parfait's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

245. Plaintiff Hertha Parfait has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Hertha Parfait has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

246. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Hertha Parfait has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Hertha Parfait is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Hertha Parfait demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Hertha Parfait the costs of this civil action, attorneys' fees and expert witness fees.

Count 49- Claudette Pierre v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Claudette Pierre sues SemTribe and Auguste and alleges:

247. Plaintiff Claudette Pierre realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

248. Plaintiff Claudette Pierre (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

249. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Claudette Pierre's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

250. Plaintiff Claudette Pierre has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Claudette Pierre has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

251. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Claudette Pierre has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Claudette Pierre is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Claudette Pierre demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Claudette Pierre the costs of this civil action, attorneys' fees and expert witness fees.

Count 50- Hermanie Pierre v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Hermanie Pierre sues SemTribe and Auguste and alleges:

252. Plaintiff Hermanie Pierre realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

253. Plaintiff Hermanie Pierre (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

254. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure,

intimidate or interfere with Plaintiff Hermanie Pierre's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

255. Plaintiff Hermanie Pierre has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Hermanie Pierre has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

256. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Hermanie Pierre has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Hermanie Pierre is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Hermanie Pierre demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Hermanie Pierre the costs of this civil action, attorneys' fees and expert witness fees.

Count 51- Jean Louis Pierrelus v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Jean Louis Pierrelus sues SemTribe and Auguste and alleges:

257. Plaintiff Jean Louis Pierrelus realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

258. Plaintiff Jean Louis Pierrelus (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

259. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Jean Louis Pierrelus's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

260. Plaintiff Jean Louis Pierrelus has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Jean Louis Pierrelus has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

261. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Jean Louis Pierrelus has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Jean Louis Pierrelus is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil

action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Jean Louis Pierrelus demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Jean Louis Pierrelus the costs of this civil action, attorneys' fees and expert witness fees.

Count 52- Fenelon Prosper v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Fenelon Prosper sues SemTribe and Auguste and alleges:

262. Plaintiff Fenelon Prosper realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

263. Plaintiff Fenelon Prosper (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

264. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Fenelon Prosper's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

265. Plaintiff Fenelon Prosper has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Fenelon Prosper has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

266. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Fenelon Prosper has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Fenelon Prosper is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Fenelon Prosper demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Fenelon Prosper the costs of this civil action, attorneys' fees and expert witness fees.

Count 53- Boniface Petit-Beau v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Boniface Petit-Beau sues SemTribe and Auguste and alleges:

267. Plaintiff Boniface Petit-Beau realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

268. Plaintiff Boniface Petit-Beau (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the

September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

269. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Boniface Petit-Beau's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

270. Plaintiff Boniface Petit-Beau has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Boniface Petit-Beau has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

271. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Boniface Petit-Beau has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Boniface Petit-Beau is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Boniface Petit-Beau demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Boniface Petit-Beau the costs of this civil action, attorneys' fees and expert witness fees.

Count 54- Barcelot Petit-Beau v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Barcelot Petit-Beau sues SemTribe and Auguste and alleges:

272. Plaintiff Barcelot Petit-Beau realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

273. Plaintiff Barcelot Petit-Beau (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

274. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Barcelot Petit-Beau's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

275. Plaintiff Barcelot Petit-Beau has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to

final judgment this civil action. In that regard, Plaintiff Barcelot Petit-Beau has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

276. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Barcelot Petit-Beau has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Barcelot Petit-Beau is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Barcelot Petit-Beau demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Barcelot Petit-Beau the costs of this civil action, attorneys' fees and expert witness fees.

Count 55- Lydieunie Petit-Beau v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Lydieunie Petit-Beau sues SemTribe and Auguste and alleges:

277. Plaintiff Lydieunie Petit-Beau realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

278. Plaintiff Lydieunie Petit-Beau (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church

Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

279. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Lydieunie Petit-Beau's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

280. Plaintiff Lydieunie Petit-Beau has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Lydieunie Petit-Beau has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

281. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Lydieunie Petit-Beau has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Lydieunie Petit-Beau is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Lydieunie Petit-Beau demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding

Plaintiff Lydieunie Petit-Beau the costs of this civil action, attorneys' fees and expert witness fees.

Count 56- Verdeline Petit-Beau v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Verdeline Petit-Beau sues SemTribe and Auguste and alleges:

282. Plaintiff Verdeline Petit-Beau realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

283. Plaintiff Verdeline Petit-Beau (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

284. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Verdeline Petit-Beau's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

285. Plaintiff Verdeline Petit-Beau has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Verdeline Petit-Beau has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law

firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

286. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Verdeline Petit-Beau has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Verdeline Petit-Beau is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Verdeline Petit-Beau demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Verdeline Petit-Beau the costs of this civil action, attorneys' fees and expert witness fees.

Count 57- Keldy Denita Pierre v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Keldy Denita Pierre sues SemTribe and Auguste and alleges:

287. Plaintiff Keldy Denita Pierre realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

288. Plaintiff Keldy Denita Pierre (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

289. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Keldy Denita Pierre's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

290. Plaintiff Keldy Denita Pierre has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Keldy Denita Pierre has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

291. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Keldy Denita Pierre has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Keldy Denita Pierre is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Keldy Denita Pierre demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Keldy Denita Pierre the costs of this civil action, attorneys' fees and expert witness fees.

Count 58- Lines Pierre v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Lines Pierre sues SemTribe and Auguste and alleges:

292. Plaintiff Lines Pierre realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

293. Plaintiff Lines Pierre (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

294. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Lines Pierre's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

295. Plaintiff Lines Pierre has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Lines Pierre has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

296. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Lines Pierre has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Lines Pierre is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Lines Pierre demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Lines Pierre the costs of this civil action, attorneys' fees and expert witness fees.

Count 59- Lavita Pierre v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Lavita Pierre sues SemTribe and Auguste and alleges:

297. Plaintiff Lavita Pierre realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

298. Plaintiff Lavita Pierre (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

299. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure,

intimidate or interfere with Plaintiff Lavita Pierre's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

300. Plaintiff Lavita Pierre has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Lavita Pierre has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

301. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Lavita Pierre has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Lavita Pierre is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Lavita Pierre demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Lavita Pierre the costs of this civil action, attorneys' fees and expert witness fees.

Count 60- Aneila Pierre-Louis v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Aneila Pierre-Louis sues SemTribe and Auguste and alleges:

302. Plaintiff Aneila Pierre-Louis realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

303. Plaintiff Aneila Pierre-Louis (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

304. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Aneila Pierre-Louis's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

305. Plaintiff Aneila Pierre-Louis has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Aneila Pierre-Louis has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

306. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Aneila Pierre-Louis has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Aneila Pierre-Louis is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil

action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Aneila Pierre-Louis demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Aneila Pierre-Louis the costs of this civil action, attorneys' fees and expert witness fees.

Count 61- Fana Racine v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Fana Racine sues SemTribe and Auguste and alleges:

307. Plaintiff Fana Racine realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

308. Plaintiff Fana Racine (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

309. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Fana Racine's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

310. Plaintiff Fana Racine has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Fana Racine has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

311. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Fana Racine has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Fana Racine is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Fana Racine demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Fana Racine the costs of this civil action, attorneys' fees and expert witness fees.

Count 62- Mirlande Racine v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Mirlande Racine sues SemTribe and Auguste and alleges:

312. Plaintiff Mirlande Racine realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

313. Plaintiff Mirlande Racine (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church

Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

314. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Mirlande Racine's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

315. Plaintiff Mirlande Racine has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Mirlande Racine has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

316. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Mirlande Racine has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Mirlande Racine is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Mirlande Racine demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding

Plaintiff Mirlande Racine the costs of this civil action, attorneys' fees and expert witness fees.

Count 63- Jackson Roberson v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Jackson Roberson sues SemTribe and Auguste and alleges:

317. Plaintiff Jackson Roberson realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

318. Plaintiff Jackson Roberson (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

319. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Jackson Roberson's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

320. Plaintiff Jackson Roberson has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Jackson Roberson has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law

firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

321. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Jackson Roberson has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Jackson Roberson is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Jackson Roberson demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Jackson Roberson the costs of this civil action, attorneys' fees and expert witness fees.

Count 64- Solange Roberson v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Solange Roberson sues SemTribe and Auguste and alleges:

322. Plaintiff Solange Roberson realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

323. Plaintiff Solange Roberson (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

324. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Solange Roberson's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

325. Plaintiff Solange Roberson has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Solange Roberson has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

326. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Solange Roberson has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Solange Roberson is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Solange Roberson demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Solange Roberson the costs of this civil action, attorneys' fees and expert witness fees.

Count 65- Aliane Santil v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Aliane Santil sues SemTribe and Auguste and alleges:

327. Plaintiff Aliane Santil realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

328. Plaintiff Aliane Santil (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

329. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Aliane Santil's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

330. Plaintiff Aliane Santil has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Aliane Santil has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

331. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Aliane Santil has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Aliane Santil is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Aliane Santil demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Aliane Santil the costs of this civil action, attorneys' fees and expert witness fees.

Count 66- Luckerne Santil v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Luckerne Santil sues SemTribe and Auguste and alleges:

332. Plaintiff Luckerne Santil realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

333. Plaintiff Luckerne Santil (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

334. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure,

intimidate or interfere with Plaintiff Luckerne Santil's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

335. Plaintiff Luckerne Santil has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Luckerne Santil has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

336. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Luckerne Santil has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Luckerne Santil is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Luckerne Santil demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Luckerne Santil the costs of this civil action, attorneys' fees and expert witness fees.

Count 67- Hermantilde Santil v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Hermantilde Santil sues SemTribe and Auguste and alleges:

337. Plaintiff Hermantilde Santil realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

338. Plaintiff Hermantilde Santil (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

339. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Hermantilde Santil's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

340. Plaintiff Hermantilde Santil has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Hermantilde Santil has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

341. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Hermantilde Santil has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Hermantilde Santil is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil

action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Hermantilde Santil demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Hermantilde Santil the costs of this civil action, attorneys' fees and expert witness fees.

Count 68- Marie Santil v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Marie Santil sues SemTribe and Auguste and alleges:

342. Plaintiff Marie Santil realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

343. Plaintiff Marie Santil (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

344. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Marie Santil's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

345. Plaintiff Marie Santil has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Marie Santil has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

346. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Marie Santil has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Marie Santil is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Marie Santil demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Marie Santil the costs of this civil action, attorneys' fees and expert witness fees.

Count 69- Jean Solvilien v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Jean Solvilien sues SemTribe and Auguste and alleges:

347. Plaintiff Jean Solvilien realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

348. Plaintiff Jean Solvilien (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church

Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

349. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Jean Solvilien's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

350. Plaintiff Jean Solvilien has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Jean Solvilien has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

351. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Jean Solvilien has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Jean Solvilien is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Jean Solvilien demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Jean

Solvilien the costs of this civil action, attorneys' fees and expert witness fees.

Count 70- Muregne St-Louis v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Muregne St-Louis sues SemTribe and Auguste and alleges:

352. Plaintiff Muregne St-Louis realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

353. Plaintiff Muregne St-Louis (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

354. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Muregne St-Louis's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

355. Plaintiff Muregne St-Louis has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Muregne St-Louis has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution

of this civil action.

356. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Muregne St-Louis has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Muregne St-Louis is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Muregne St-Louis demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Muregne St-LouisJean the costs of this civil action, attorneys' fees and expert witness fees.

Count 71- Andy Saint-Remy v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Any Saint-Remy sues SemTribe and Auguste and alleges:

357. Plaintiff Andy Saint-Remy realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

358. Plaintiff Andy Saint-Remy (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

359. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Andy Saint-Remy's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

360. Plaintiff Andy Saint-Remy has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Andy Saint-Remy has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

361. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Andy Saint-Remy has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Andy Saint-Remy is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Andy Saint-Remy demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Andy Saint-Remy the costs of this civil action, attorneys' fees and expert witness fees.

Count 72- Acceline Saint-Remy v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Acceline Saint-Remy sues SemTribe and Auguste and alleges:

362. Plaintiff Acceline Saint-Remy realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

363. Plaintiff Acceline Saint-Remy (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

364. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Acceline Saint-Remy's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

365. Plaintiff Acceline Saint-Remy has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Acceline Saint-Remy has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

366. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Acceline Saint-Remy has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Acceline Saint-Remy is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Acceline Saint-Remy demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Acceline Saint-Remy the costs of this civil action, attorneys' fees and expert witness fees.

Count 73- Leonne Saint-Remy v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Leonne Saint-Remy sues SemTribe and Auguste and alleges:

367. Plaintiff Leonne Saint-Remy realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

368. Plaintiff Leonne Saint-Remy (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

369. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical

obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Leonne Saint-Remy's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

370. Plaintiff Leonne Saint-Remy has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Leonne Saint-Remy has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

371. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Leonne Saint-Remy has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Leonne Saint-Remy is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Leonne Saint-Remy demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Leonne Saint-Remy the costs of this civil action, attorneys' fees and expert witness fees.

Count 74- Joseph Sylvain v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Joseph Sylvain sues SemTribe and Auguste and alleges:

372. Plaintiff Joseph Sylvain realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

373. Plaintiff Joseph Sylvain (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

374. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Joseph Sylvain's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

375. Plaintiff Joseph Sylvain has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Joseph Sylvain has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

376. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Joseph Sylvain has sustained injuries and losses for which,

pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Joseph Sylvain is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Joseph Sylvain demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Joseph Sylvain the costs of this civil action, attorneys' fees and expert witness fees.

Count 75- Bienne Tanis v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Bienne Tanis sues SemTribe and Auguste and alleges:

377. Plaintiff Bienne Tanis realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

378. Plaintiff Bienne Tanis (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

379. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Bienne Tanis's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

380. Plaintiff Bienne Tanis has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Bienne Tanis has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

381. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Bienne Tanis has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Bienne Tanis is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Bienne Tanis demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Bienne Tanis the costs of this civil action, attorneys' fees and expert witness fees.

Count 76- Lucia Tanis v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Lucia Tanis sues SemTribe and Auguste and alleges:

382. Plaintiff Lucia Tanis realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

383. Plaintiff Lucia Tanis (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church

Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

384. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Lucia Tanis's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

385. Plaintiff Lucia Tanis has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Lucia Tanis has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

386. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Lucia Tanis has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Lucia Tanis is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Lucia Tanis demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Lucia Tanis the costs of this civil action, attorneys' fees and expert witness fees.

Count 77- Itony Telusnord v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Itony Telusnord sues SemTribe and Auguste and alleges:

387. Plaintiff Itony Telusnord realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

388. Plaintiff Itony Telusnord (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

389. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Itony Telusnord's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

390. Plaintiff Itony Telusnord has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Itony Telusnord has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

391. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Itony Telusnord has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Itony Telusnord is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Itony Telusnord demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Itony Telusnord the costs of this civil action, attorneys' fees and expert witness fees.

Count 78- Marie Angelet Telusnord v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Marie Angelet Telusnord sues SemTribe and Auguste and alleges:

392. Plaintiff Marie Angelet Telusnord realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

393. Plaintiff Marie Angelet Telusnord (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

394. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure,

intimidate or interfere with Plaintiff Marie AngeletTelusnord's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

395. Plaintiff Marie AngeletTelusnord has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Marie Angelet Telusnord has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

396. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Marie Angelet Telusnord has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Marie AngeletTelusnord is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Marie Angelet Telusnord demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Marie Angelet Telusnord the costs of this civil action, attorneys' fees and expert witness fees.

Count 79- Dieniva Thervil v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Dieniva Thervil sues SemTribe and Auguste and alleges:

397. Plaintiff Dieniva Thervil realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

398. Plaintiff Dieniva Thervil (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

399. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Dieniva Thervil's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

400. Plaintiff Dieniva Thervil has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Dieniva Thervil has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

401. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Dieniva Thervil has sustained injuries and losses for which,

pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Dieniva Thervil is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Dieniva Thervil demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Dieniva Thervil the costs of this civil action, attorneys' fees and expert witness fees.

Count 80- Ludie Thervil v. SemTribe and Auguste/18 U.S.C. § 248(c)(1)

Plaintiff Ludie Thervil sues SemTribe and Auguste and alleges:

402. Plaintiff Ludie Thervil realleges the matters set forth in ¶¶ 1 through 11 of this First Amended Complaint.

403. Plaintiff Ludie Thervil (a) is a resident of Broward County, Florida, (b) is a member of Eglise Baptiste, (c) is not subject to any legal disabilities, (d) attended the September 29, 2019, Sabbath services in the religious structure located on the Church Property, (e) was expelled from the Church Property by SemTribe's police officers, and (f) continues to be excluded from the Church Property by Auguste and her supporters.

404. SemTribe and Auguste on September 29, 2019, violated 18 U.S.C. § 248(a)(2) when SemTribe's police officers and Auguste, by force or threat of force or by physical obstruction, intentionally injured, intimidated or interfered with, or attempted to injure, intimidate or interfere with Plaintiff Ludie Thervil's exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

405. Plaintiff Ludie Thervil has been compelled to engage the professional services of Metschlaw, P.A., for the purposes of preparing, commencing and prosecuting to final judgment this civil action. In that regard, Plaintiff Ludie Thervil has obligated himself/herself to pay that law firm reasonable attorneys' fees and to reimburse that law firm's necessary, out-of-pocket, non-overhead expenditures incurred during the prosecution of this civil action.

406. As the proximate result of the foregoing conduct of SemTribe and Auguste on September 29, 2019, Plaintiff Ludie Thervil has sustained injuries and losses for which, pursuant to 18 U.S.C. § 248(c)(1), Plaintiff Ludie Thervil is entitled to recover from SemTribe and Auguste compensatory damages, punitive damages, the costs of this civil action, attorneys' fees and expert witness fees.

Wherefore, Plaintiff Ludie Thervil demands judgment, jointly and severally, against SemTribe and Auguste for compensatory and punitive damages and awarding Plaintiff Ludie Thervil the costs of this civil action, attorneys' fees and expert witness fees.

DEMAND FOR JURY TRIAL

407. Plaintiffs demand trial by jury of all claims and issues so triable.

METSCHLAW, P.A.
Attorneys for Plaintiffs
20801 Biscayne Blvd., Ste. 300
Aventura, FL 33180-1423
Telephone: (305) 792-2540
Telecopier: (305) 792-2541
E-Mail: l.metsch@metsch.com

By S/Lawrence R. Metsch
LAWRENCE R. METSCH
FBN 133162

CERTIFICATE OF SERVICE

I hereby certify that, using the District Court's CM/ECF facility, true copies of the foregoing First Amended Complaint have been electronically served this 1st day of December, 2019, on:

Mark D. Schellhase, Esq. (Mark.schellhase@gray-robinson.com)
Emily Lauren Pineless, Esq. (Emily.pineless@gray-robinson.com)
GrayRobinson, P.A.
225 N.E. Mizner Blvd., Suite 500
Boca Raton, FL 33432-4086
E-Mail: ingrid.reichel@gray-robinson.com

Mark C. Johnson, Esq. (MJ@JohnsonDalal.com)
Abdul-Sumi Dalal, Esq.
Johnson|Dalal
111 North Pine Island Road, Suite 103
Plantation, FL 33324
E-Mail: JT@JohnsonDalal.com
E-Mail: Service@JohnsonDalal.com

S/Lawrence R. Metsch
LAWRENCE R. METSCH