

IN THE CIRCUIT COURT OF THE COUNTY OF ST. LOUIS
STATE OF MISSOURI

MISSOURI RESTAURANT ASSOCIATION,)
INC., SYBERG'S EATING AND DRINKING)
COMPANY, INC., SYBERG'S WESTPORT,)
INC., SYBERG'S CHESTERFIELD, LLC,)
HELEN FITZGERALD'S IRISH GRILL AND)
PUB, BARTOLINO'S SOUTH, INC,)
WEBEHOMEYZ LLC, FGB GROUP LLC,)
RUMPLEMANS, LLC, THE SHACK)
RESTAURANT GROUP, LLC, THE SHACK)
FRONTENAC, LLC, WEBSHACKING3, LLC,)
WEBSHACKING6 LLC, DEBRON)
ENTERPRISES, INC, SHELRIK)
INCORPORATED, PAUL DUFFYS DAD 1 LP,)
SPORTSTIME 1 LP, K.C. TWINS INC.,)
CITIZEN KANES STEAKHOUSE)
LLC, SILVERTHRONE, INC, STL HARP, LLC,)
HANK AIR MANAGEMENT, LLC, RANCH,)
INC; RANCH-DES PERES INC., DDMR LLC,)
D.D. RYANS LLC, 3 KINGS HOLDING)
COMPANY LLC, KBI2 LLC, R.F.O. INC.,)
SAM'S STEAKHOUSE INC., EBZ)
CORPORATION, UNAMI, LLC, SHASHA'S)
LLC, THE CROSSING RESTAURANT, LLC,)
ZUCCA, LLC, MASSA LTD.; R&M)
RESTAURANT LLC, GRAHAM'S GRILL, INC.,)
and SATCHMO'S BAR AND GRILL,)

Plaintiffs,)

vs.)

SAINT LOUIS COUNTY, MO,)

Serve at:)
10 N. Bemiston)
Clayton, MO 63105)

Cause No.

Division No.

SAM PAGE, in his capacity as)
 St. Louis County Executive and individually, and)
)
 Serve at:)
 41 South Central Avenue)
 Clayton, Missouri 63105)
)
 EMILY DOUCETTE, in her capacity as)
 Acting Director and Chief Medical Officer)
 of the St. Louis County Department of Public)
 Health and individually,)
)
 Serve at:)
 41 South Central)
 Clayton, MO 63105)
)
 Defendants.)

**PLAINTIFFS’ VERIFIED PETITION FOR
 TEMPORARY RESTRAINING ORDER, PRELIMINARY INJUNCTION,
 PERMANENT INJUNCTION AND DECLARATORY RELIEF**

Plaintiffs, by and through their attorneys, for their Verified Petition for Temporary Restraining Order, Preliminary Injunction, Permanent Injunction and Declaratory Relief against Defendants St. Louis County, Missouri, Sam Page and Emily Doucette, state as follows:

INTRODUCTION

1. On March 13, 2020, County Executive Sam Page declared a State of Emergency in St. Louis County and began issuing a string of executive orders regarding COVID-19 restrictions on individuals and businesses.

2. Page’s use of executive orders, premised on a public emergency, allowed him to avoid democratic channels of legislation—via the County Council—and proceed unilaterally.

3. Eight months later, orders keep coming. But they are now in the form of “Public Health Orders” which are issued by the County Director of Public Health, Emily Doucette, as a result of a purported delegation from Page. These orders are being issued, despite the fact that, as

rules and regulations, they require the approval of the St. Louis County Council, which is readily available and has time to act as necessary. The St. Louis County Council meets every Tuesday and can hold a special meeting with only 24 hours' notice, but the Council's approval of their rules has not been sought by Defendants.

4. Restaurants have struggled through many of the orders and the pandemic in general by operating with limited capacity dining rooms and with various other restrictions in place. Many have been able to take advantage of nice weather for outdoor seating.

5. The latest Doucette order, the so-called "Safer at Home Order" dated November 12, comes at a time when outdoor seating will be phased out naturally by the winter. This order states that the other option for restaurants, indoor dining, is now illegal. Doucette states in the order that restaurants in violation face criminal penalties, civil penalties, and even forced closure.

6. Plaintiffs, in addition to the Missouri Restaurant Association, are local restaurant owners who depend on restaurants for their livelihoods and to provide jobs to others. They believe in safely operating their restaurants by social distancing, wearing masks, sanitizing surfaces, and limiting capacity, but they also believe that they must operate with indoor dining to economically survive.

7. Rent, mortgage and utility bills will not stop coming while Plaintiffs' restaurants are shut down, and there will be no sales to customers to pay those bills other than from takeout. Plaintiffs will have to lay off staff, and ultimately may face permanent closure of their operations. Without the opportunity to safely operate their businesses, Plaintiffs face an existential threat.

8. Plaintiffs bring this lawsuit, seeking a temporary restraining order and other relief, because Defendants' actions have prohibited their ability to safely conduct their restaurant

businesses in St. Louis County by creating ever-changing, indefinite, arbitrary and capricious laws that they have no authority to create.

9. The Defendants do not have legal authority to issue these laws. They do, however, have the ability to have the County Council democratically consider and approve such restrictions. Indeed, the law requires the following chain of events. Matters of public health are addressed in St. Louis County Ordinance 602.020(3), which authorizes the Director of Health, or the Medical Director, to have “general supervision over the public health, and empowers the director, *with approval of the council*,” to make rules and regulations to promote or preserve the health of persons in the county (emphasis added).

10. Instead, Defendants operate unlawfully and without authority by unilateral executive orders. This continuing exercise of one-person rule violates the fundamental theory of separation of powers, it violates Missouri non-delegation law, and it violates the plain text of the ordinance quoted above.

11. No one disputes that the exercise of executive power may be necessary in some time-limited, emergency situations. But the Defendants’ sweeping assertion that they can rule by emergency powers, in unlimited duration and without any regard for the County Council, exceeds the scope of their statutory authority. This sets an extraordinarily dangerous precedent. “While the law may take periodic naps during a pandemic, we will not let it sleep through one.” *Maryville Baptist Church, Inc. v. Beshear*, __ F.3d __, 2020 WL 2111316, at *4 (6th Cir. May 2, 2020).

12. There is an easy next step here—have the Defendants’ ideas for fighting COVID-19 go through the proper legislative channels with the County Council. Plaintiffs might not like what happens next, and there may be other battles at that point, but that is what democracy requires and the law says must happen. Plaintiffs bring this lawsuit to define the limits of the County

Executive's and Medical Director's police power. These limits cannot sanction autocratic or absolute executive power that casts fundamental principles of separation of powers to the wind.

PARTIES, JURISDICTION, AND VENUE

13. Plaintiff Missouri Restaurant Association, Inc. (Restaurant Association) is a non-profit corporation organized and existing under the laws of the State of Missouri. The Restaurant Association is comprised of food service educators, companies and organizations engaged in commercial and institutional food service in Missouri and firms engaged in sales to the Missouri food service industry. The Restaurant Association serves as the principal advocate for the restaurant and food service industry within the state of Missouri. The Restaurant Association brings this suit on behalf of its members who will be adversely affected by implementation of the Defendants' Safer at Home Order. The issues at stake in this lawsuit are germane to the Restaurant Association's purposes and relevant to the day-to-day operations of its members. The Restaurant Association's members include entities which hire and employ individuals within the geographical boundaries of St. Louis County. The Restaurant Association's members would otherwise have standing to sue in their own right and neither the claim asserted nor the relief requested requires the participation in this lawsuit of the individual members.

14. The other plaintiffs are entities that own and operate restaurants in St. Louis County. They are listed as follows with their commonly known restaurant names in parentheses as needed: Syberg's Eating And Drinking Company, Inc., Syberg's Westport, Inc., Syberg's Chesterfield, LLC, Helen Fitzgerald's Irish Grill And Pub, Inc., Bartolino's South, Inc., Webhomeyz LLC (Corner Pub and Grill), FGB Group LLC (Corner Pub and Grill), Rumplemans LLC (Tavern Kitchen and Bar), The Shack Restaurant Group LLC, The Shack Frontenac LLC, Webshacking3 LLC (Shack Breakfast and Lunch), Webshacking6 LLC (Shack Breakfast and

Lunch), Debron Enterprises, Inc. (Tucker's), Shelrik Incorporated (Tucker's), Paul Duffys Dad 1 LP (Mike Duffy's Pub & Grill), Sportstime 1 LP (Mike Duffy's Pub & Grill), K.C. Twins Inc. (Mike Duffy's Pub & Grill), Citizen Kanes Steakhouse LLC, Silverthorne, Inc. (Country Club Bar & Grill), Ranch Inc. (Circle 7 Ranch), Ranch-Des Peres Inc. (Circle 7 Ranch), DDMR LLC (3 Kings), D.D. Ryans LLC (3 Kings), 3 Kings Holding Company LLC (3 Kings), KBI2 LLC (Mia Sorella), STL HARP LLC (Harpo's), Hank Air Management LLC (Bobby's Place), R.F.O. Inc. (Mulligan's Grill), Sam's Steakhouse Inc., EBZ Corporation (Acapulco), Unami, LLC (Fitz's South County), Shasha's LLC (Sasha's), The Crossing Restaurant, LLC, Zucca, LLC (Acero), Massa Ltd. (Massa's), R&M Restaurant LLC (Massa's), Graham's Grill Inc. and Satchmo's Bar and Grill.

15. Defendants are St. Louis County, a charter county incorporated in the State of Missouri, and Sam Page and Emily Doucette, in their individual and official capacities.

16. St. Louis County is a charter county governed by the St. Louis County Charter Commission of 1979 ("Charter"), which established a charter form of county government.

17. Sam Page is the St. Louis County Executive as set forth in the Charter. County Charter, Art. III, § 3.050.1.

18. Emily Doucette is the Acting Medical Director as set forth in the Charter. County Charter, Art. III, § 4.120.

19. Jurisdiction is proper in this Court because Defendants are located in the State of Missouri and St. Louis County, because Defendants issued orders relevant to this matter in the State of Missouri and St. Louis County, and because the facts giving rise to Plaintiffs' claims against Defendants took place in the State of Missouri and St. Louis County.

20. Venue is proper in this Court pursuant to Mo. Rev. Stat. 508.010 because there is personal jurisdiction over Defendants.

FACTS COMMON TO ALL COUNTS

The County's Previous COVID-19 Orders

21. Sam Page issued Executive Order No. 10 on March 13, 2020 which declared a state of emergency pursuant to 703.070 SLCRO, acting under the authority of Chapter 44, RSMo.

22. He also named the County Health Director, pursuant to Article IV, Section 4.130 of the Charter, as the Acting Director of the Department of Public Health, to exercise those powers and perform those duties required by law to be performed as set forth therein, including to “see that laws and ordinances relating to public health are observed and enforced.” He appointed the superintendent of the County police to enforce said orders.

23. The procedure for implementing Page's executive orders involves a press conference by Page and a surprise rule or regulation posted on www.stlcorona.com drafted by Doucette, usually with no warning or clear guidance. Often the rules and regulations make no sense, are very difficult to comprehend, and sometimes change without any notice.

Page Purports to Delegate Power to the County Medical Director.

24. On April, 22, 2020, Defendant Page enacted Executive Order 17 which extended restrictions enacted under Executive Order 15 and added the following provision: “The Director of the Department of Public Health shall impose the restrictions described herein and shall continue to impose those restrictions until she deems that such restrictions are no longer necessary to protect public health and safety.”

25. Executive Order 17 states in relevant part, “The Director of the Department of Public Health may promulgate such mandatory or advisory rules, orders, policies, and guidance as

is necessary and appropriate to implement this Executive Order or to define any of the terms used in this order. Mandatory rules, orders, or policies so promulgated shall have the force of law to greatest extent permitted by federal, state, and county law.”

26. Consistent with Defendant Page’s Executive Order 17, Medical Director Doucette issued dozens of orders and amendments establishing restrictions, including on healthy people who have not been exposed to COVID-19.

27. Medical Director Doucette’s orders generally specify that any guidelines issued by the Department of Health have the full force and effect of law.

Defendants’ November 12 Safer at Home Order

28. On November 12, Defendant Emily Doucette penned a new Safer at Home Order with restrictions along the same lines, but heightened, as those in previous emergency orders.¹ See Exhibit 1.

29. The order states: “A state of emergency was declared in St. Louis County on March 13, 2020, and several executive orders have been issued since authorizing the director of DPH to issue orders, policies, and other rules to implement those executive orders.”

30. Doucette describes her authority as follows: “The DPH’s director is the ‘local health authority’ under 19 CSR 20-20.050(1) pursuant to 19 CSR 20-20.010(26), Section 4.130 of the Charter, and Section 600.010 SLCRO, and has been delegated the authority to act on St. Louis County’s behalf for the public health purposes described in § 192.300, RSMo.”

31. Pertinent to Plaintiffs, the order states as follows: “Restaurants must cease all indoor service and are only allowed to provide outdoor service, carryout and delivery.” Exhibit 1.

¹ Available at <https://stlcorona.com/dr-pages-messages/public-health-orders/all-public-health-orders-archives/2019-novel-coronavirus-covid-19-safer-at-home-order/>

32. Meanwhile, Dr. Alex Garza of the St. Louis Metropolitan Pandemic Task Force recently questioned the point of shutting down restaurants: “Even if we did shut down restaurants and bars, I don't know how much of an impact that would have on transmission, because there is so much now out in the community.”²

33. As to enforcement, Safer at Home Order calls for civil and criminal penalties, disqualification from future financial benefits, and closure:

Failure to comply with a public health order designed to “prevent the entrance of infectious, contagious, communicable or dangerous diseases” into St. Louis County is enforceable and punishable under Missouri law. In addition to the authority of DPH, in accordance with Section 5.030 of the St. Louis County Charter, the St. Louis County Counselor can seek emergency injunctive relief or other civil relief to enforce any provision of this Order. Pursuant to Section 5.060 of the St. Louis County Charter, the St. Louis Prosecuting Attorney can pursue criminal charges for violation of this Order. Noncompliance with this Order or the guidelines may also disqualify Businesses from future financial benefits.

...

In addition to other civil and criminal penalties that may be sought, DPH may enforce this Order by administrative order of closure.

See Exhibit 1. Sam Page said on the morning of November 18 that “all of our legal options” are on the table to address those violating the county’s Safer at Home Order by dining inside restaurants.³

34. The order took effect on November 17, 2020 and continues “in effect until amended or rescinded.”

35. Restaurants and drinking establishments are the only specific type of entity that is closed off from people entering. Schools and churches remain allowed to operate. Kids can still play sports. Nothing in the order closes malls or hair or nail salons, although presumably their

² Available at <https://news.stlpublicradio.org/2020-10-28/doctors-say-masks-needed-across-st-louis-region-as-restrictions-might-not-be-enough>

³ https://www.stltoday.com/news/local/govt-and-politics/page-says-all-of-our-legal-options-on-the-table-to-enforce-st-louis-county/article_8cb3349e-82fe-532b-a0c9-0b99ffdab1a4.html

customers would have to come from outside of St. Louis County (*e.g.*, from St. Louis City or St. Charles County) because County residents must only leave home for specified reasons that do not include shopping or having their nails done.

36. The order allows for certain businesses, but not restaurants, to submit a “plan” for approved operations. These businesses “include entertainment and attraction venues, concert venues, commercial or professional sporting events, museums, and casinos.” *See* Exhibit 1.

37. So a concert venue can operate under the order and submission/passage of a plan, but a restaurant cannot.

38. Restaurants remain open for indoor dining in the City of St. Louis, St. Charles County, and all other neighboring counties. In a County/City neighborhood such as the Delmar Loop, for instance, this means that restaurants doors away from each other face wildly different rules and restrictions.

Defendants Lack Authority for their Orders.

39. The restrictions on restaurants are without rational basis and are arbitrary, capricious and unreasonable in what they allow and disallow, but they are also **without authority**. In fact, the executive orders passed by Page were defective from the beginning.

40. St. Louis County Ordinance 703.030 permits the County Executive to declare a state of emergency only “[i]n the event of actual enemy attack upon the United States or of the occurrence of disaster from fire, flood, earthquake, or other natural causes involving imminent peril to lives and property in St. Louis County.” Saint Louis County Ordinance 703.070 - State of Emergency—Duties. (O. No. 15175, 9-28-90).

41. Defendant Page’s order declaring a state of emergency does not relate to the type of natural disaster addressed by this local ordinance. In this flawed initial order Page put matters

of public health into the hands of one person—Medical Director Doucette.⁴

42. Matters of public health are actually addressed in St. Louis County Ordinance 602.020, which authorizes the Director of Health, or the “Medical Director,” to have “general supervision over the public health,” and empowers the director “*with the approval of the County Council* to make such rules and regulations consistent with the Charter, laws and ordinances as will tend to promote or preserve the health of the County and carry out the intents and purposes of this chapter.” St. Louis County Ordinance 602.020.3 (emphasis added).

43. The Medical Director’s power to enact rules and regulations is explicitly subject to the approval of the County Council. However, the County Council has given no such approval, nor have Defendants ever sought the approval of the council. In fact, members of the County Council have repeatedly requested the opportunity to weigh in on the orders issued by Doucette, but their requests have been denied.⁵ Director Doucette’s orders are thus unenforceable and void until approved by the County Council.

44. Any dependence by Defendants on rules of the Department of Health and Senior Services (DHSS) is also misplaced. Section 192.020(1) grants authority to DHSS to make rules and regulations with respect to infectious diseases. Section 192.300 grants counties the ability to make additional rules, but only to “enhance the public health and prevent **the entrance of infectious, contagious, communicable or dangerous diseases into such county,**” and those rules

⁴ <https://stlouiscountymo.gov/st-louis-county-government/county-executive/county-executive-orders/executive-order-10/>

⁵ See Exhibit 2, Affidavits of County Council Members Timothy E. Fitch, Mark Harder, and Ernest Trakas, explaining that the County Council has never voted on any of Doucette’s orders nor has it been asked to vote on any of said orders. In these affidavits, Council Members describe their repeated requests for data supporting Defendants’ orders, for the authority for the orders, and for an explanation as to why the County Council does not need to approve the orders under local ordinance 602.020. The only explanation they have received is that “state law trumps the local law.” *Id.*

must only be issued by a “county commission” or “county health center board.” (emphasis added). Moreover, 192.300(5) provides that only a county commission can issue a rule that imposes a criminal misdemeanor charge.

45. Defendants’ regulation of restaurants does not address the entrance of disease into the County, does not involved the collaboration of the “county commission” or “county health center board,” and their criminal penalties clearly violate Missouri law.

46. Further, Defendant Page cannot delegate powers, such as those to *imprison*, to the Medical Director. The Missouri Constitution forbids the Medical Director from issuing orders that subject citizens to fines or imprisonment. Indeed, the “delegation to any administrative agency of the authority to make any rule fixing a fine or imprisonment as punishment for its violation” is specifically prohibited. Mo. Const. Article 1, Section 31.

47. In issuing the Safer at Home Order, Doucette has usurped the County Council’s shared democratic functions in violation of the separation of powers.

48. Defendants’ actions are thus, for several reasons, void. *Missouri Bankers Association, Inc. v. St. Louis County, Mo.*, 448 S.W.3d 267 (Mo. 2014) (holding that acts performed by a county that are beyond the powers granted or necessarily implied from its charter are void).

49. The effect of Page’s and Doucette’s circumvention of the County Council also allows them to avoid procedural safeguards, such as a notice and comment period. Here, the County’s Medical Director is acting alone—with power purportedly from from Sam Page—with no opportunity for public notice or comment, and no opportunity for the aggrieved to have a hearing regarding any deprivation of liberty or property. Even DHSS could not issue rules and

regulations under such circumstances. Emergency orders by state agencies, for instance, require a ten-day comment period after being filed with the Secretary of State

50. Defendants view COVID-19 as conferring an unfettered power upon them to regulate private conduct in whatever manner they deem necessary without any procedural, substantive or temporal constraints on their authority. Defendants are wrong.

The Effect on Plaintiffs⁶

51. In the absence of immediate injunctive relief, Defendants' arbitrary and unlawfully procured orders pose an existential threat to members of the Restaurant Association including the named Plaintiffs.

52. Plaintiffs are willing and able to conform their restaurants to reasonable safety guidelines, as they have always done. However, many plaintiffs do not have the ability to operate outdoors due to their physical locations and would not be able to do so anyway given winter weather.

53. The restaurant plaintiffs will continue to incur bills while trying to subsist, if they choose to operate at all, on takeout sales alone—a small portion of sales for all restaurant plaintiffs.

54. The restaurant plaintiffs' employees—of which there are several hundred—will have no place to work and earn money. And rehiring, restaffing and retraining will be painstaking and expensive when Plaintiffs are allowed to reopen.

55. If the restaurant plaintiffs are not allowed to stay open/reopen during the typically lucrative holiday season, they will suffer irreparable harm including the likelihood that they will have to cease operations forever and permanently close.

⁶ Allegations regarding the restaurant plaintiffs are supported by their sworn verification of this petition and the affidavits attached as Exhibit 3.

56. An actual and substantial controversy exists between Plaintiffs and Defendants as to the parties' respective rights and responsibilities. A judicial determination of the parties' rights and the constitutionality of Defendants' Safer at Home Order, as applied to the Plaintiffs, will give relief from the uncertainty and insecurity giving rise to this controversy.

**COUNT I: DEFENDANTS LACK AUTHORITY
TO ISSUE THE NOVEMBER 12, 2020 SAFER AT HOME ORDER
AS IT APPLIES TO RESTAURANTS.**

57. Plaintiffs restate and incorporate by reference the allegations in all preceding paragraphs as if fully set forth herein.

58. As described above, Defendants lack the statutory authority—either in their own right or by delegation—to adopt and issue the Safer at Home Order.

59. Matters of public health are addressed in St. Louis County Ordinance 602.020, which authorizes the Director of Health, or the “Medical Director,” to have “general supervision over the public health,” and empowers the director “*with the approval of the County Council* to make such rules and regulations consistent with the Charter, laws and ordinances as will tend to promote or preserve the health of the County and carry out the intents and purposes of this chapter.” St. Louis County Ordinance 602.020.3 (emphasis added). Defendants have neither obtained nor sought the approval of the County Council for their orders.

60. Defendant Page's initial order declaring a state of emergency was flawed, as St. Louis County Ordinance 703.030 permits the County Executive to declare a state of emergency only “[i]n the event of actual enemy attack upon the United States or of the occurrence of disaster from fire, flood, earthquake, or other natural causes involving imminent peril to lives and property in St. Louis County.” Saint Louis County Ordinance 703.070 - State of Emergency—Duties. (O. No. 15175, 9-28-90). COVID-19 is none of these things.

61. Department of Health and Senior Services (DHSS) rules cannot save Defendants' orders. Section 192.020(1) grants authority to DHSS to make rules and regulations with respect to infectious diseases. Section 192.300 grants counties the ability to make additional rules, but only to "enhance the public health and prevent **the entrance of infectious, contagious, communicable or dangerous diseases into such county,**" and those rules must only be issued by a "county commission" or "county health center board." (emphasis added). Moreover, 192.300(5) provides that only a county commission can issue a rule that imposes a criminal misdemeanor charge. Defendants' regulation of restaurants does not address the entrance of disease into the County, does not involved the collaboration of the "county commission" or "county health center board," and their criminal penalties clearly violate Missouri law, including its Constitution. Further, DHSS regulations giving local health authorities the right to employ "control measures" are limited and not intended for widespread diseases.

62. Defendant Page cannot delegate powers, such as those to *imprison*, to the Medical Director. The Missouri Constitution forbids the Medical Director from issuing orders that subject citizens to fines or imprisonment. Indeed, the "delegation to any administrative agency of the authority to make any rule fixing a fine or imprisonment as punishment for its violation" is specifically prohibited. Mo. Const. Article 1, Section 31. In issuing the Safer at Home Order, which announces criminal penalties for violations, Doucette has usurped the County Council's core functions in violation of the separation of powers. But in any case, Page could not delegate powers he did not have in the first place.

63. Defendants' actions are thus, for several reasons, void. *Missouri Bankers Association, Inc. v. St. Louis County, Mo.*, 448 S.W.3d 267 (Mo. 2014) (holding that acts performed by a county that are beyond the powers granted or necessarily implied from its charter

are void, and striking down a county ordinance that attempted to locally address an issue of national concern).

64. The law does not confer a freestanding and unchained authority for Defendants to issue industry closure orders and restrictions.

65. Because no law allows Defendants to order the shutdown of large portions of the County's economy and to unilaterally decide which businesses are allowed to remain open and which must close their doors on an ongoing and indefinite basis, Defendants' actions are *ultra vires* and exceed their authority.

66. In the absence of a temporary restraining order and further injunctive relief, Defendants' arbitrary and unlawfully procured orders pose an existential threat to members of the Restaurant Association including the named Plaintiffs.

67. Plaintiffs have suffered and will continue to suffer substantial and irreparable harm unless the Court declares the Defendants' Safer at Home Order regarding indoor operations unlawful and enjoins Defendants from enforcing continuing restrictions against Plaintiffs.

COUNT II: PETITION FOR REVIEW PURSUANT TO 536.150 RSMo

**THE SAFER AT HOME ORDER IS ARBITRARY,
CAPRICIOUS AND UNREASONABLE.**

68. Plaintiffs restate and incorporate by reference the allegations in all preceding paragraphs as if fully set forth herein.

69. Section 536.150 provides, in relevant part, that a decision such as the Safer at Home Order "may be reviewed by suit for injunction, certiorari, mandamus, prohibition or other appropriate action."

70. Under Section 536.150, "the circuit court conducts such a hearing as an original action." *City of Valley Park v. Armstrong*, 273 S.W.3d 504, 506 (Mo. banc 2009) (per curiam).

71. Plaintiffs seek a determination that Defendants exceeded their statutory authority in issuing the Safer at Home Order; that it was unauthorized by law; that it was arbitrary, capricious, or unreasonable; and that it was an abuse of discretion. See § 536.140.2.

72. Above, Plaintiffs describe Defendants lack of authority. But the Safer at Home Order is also arbitrary, capricious and/or unreasonable and was an abuse of discretion.

73. Restaurants and drinking establishments are the only specific type of entity that is closed off from people entering. Schools and churches remain allowed to operate. Kids can still play sports. Nothing in the order closes malls or hair or nail salons, although presumably their customers would have to come from outside of St. Louis County (e.g., from St. Louis City or St. Charles County) because County residents must only leave home for specified reasons that do not include shopping or having their nails done.

74. The order allows for certain businesses, but not restaurants, to submit a “plan” for approved operations. These businesses “include entertainment and attraction venues, concert venues, commercial or professional sporting events, museums, and casinos.” *See* Exhibit 1.

75. So a concert venue could operate under the order and submission/passage of a plan, but a restaurant cannot.

76. Restaurants remain open for indoor dining in the City of St. Louis, St. Charles County, and all other neighboring counties. In a County/City neighborhood such as the Delmar Loop, for instance, this means that restaurants doors away from each other face wildly different rules and restrictions.

77. Further, orders shutting down businesses require some degree of individualized analysis indicating that the particular operations at issue pose an immediate and direct threat of contributing to the spread of an epidemic.

78. Defendants have performed no analysis of whether the restaurant plaintiffs' operations pose any particular or unique threat of contributing to the spread of the virus that causes COVID-19; nor has there been any analysis of whether restaurant plaintiffs' operations are likely to contribute to the spread of the disease. Without some level of individualized assessment that determines that restaurant plaintiffs or their operations constitute a threat vector for COVID-19, Defendants cannot demonstrate that prohibiting their operations is tailored to achieve their public-health goals.

79. The Safer at Home Order is thus invalid and void.

COUNT III: UNLAWFUL DELEGATION

80. Plaintiffs restate and incorporate by reference the allegations in the preceding paragraphs as if fully set forth herein.

81. For over eight months, Defendants Page and Doucette have been issuing executive orders. These orders broadly affect fundamental rights, such as the right to operate a business and to leave home.

82. Page and Doucette do not have any legal authority to issue the orders they have. But even if they do, separation of powers principles bar such broad powers given to an executive for an indeterminate period.

83. The actions of Defendants Page and Doucette described above contravene core separation of powers principles emanating from Art. II, § 1 of the Missouri Constitution, in that the executive branch must cooperate with the legislative branch and refrain from taking action that would interfere with or substantially impair the ability of the legislative branch to perform its important governmental functions.

84. The core separation of powers principles that emanate from Art. II, § 1 of the Missouri Constitution require the County Executive Branch to reasonably cooperate with the County legislative branch—the County Council—and allow the County Council to do its job.

85. “[T]he principal function of the separation of powers . . . is to . . . protect individual liberty[.]” *Clinton v City of New York*, 524 US 417, 482 (1998) (Breyer, J., dissenting). This threat to liberty was address by James Madison more than 200 years ago when he wrote, “[T]he accumulation of all powers, legislative, executive, and judiciary, in the same hands, whether of one, a few, or many, and whether hereditary, self-appointed, or elective, may justly be pronounced the very definition of tyranny.” *The Federalist No. 47* (Madison) (Rossiter ed, 1961), p 301. And as Montesquieu explained, “[w]hen the legislative and executive powers are united in the same person, or in the same body of magistrates, there can be no liberty; because apprehensions may arise, lest the same monarch or senate should enact tyrannical laws, to execute them in a tyrannical manner.” Baron de Montesquieu, *The Spirit of the Laws* (London: J. Nourse and P. Vaillant, 1758), Book XI, ch 6, p 216.

86. Accordingly, “[o]ne of the settled maxims in constitutional law is, that the power conferred upon the legislature to make laws cannot be delegated by that department to any other body or authority.” Cooley, *Constitutional Limitations* (1886), pp 116-117.

87. Plaintiffs accept some delegation of power from the legislative branch to an executive during emergencies. When a tornado strikes, traditional legislative action may take too long to make an impact.

88. But the scope of that delegation is not unlimited. The Michigan Supreme Court, in striking down recent executive orders of Governor Whitmer, identified two central factors to consider: (1) the breadth of subjects to which the power can be applied and (2) the durational scope

of the delegated power. *Midwest Inst. of Health, PLLC v. Governor of Mich. (In re Certified Questions from the United States Dist. Court)*, No. 161492, 2020 Mich. LEXIS 1758, at *30 (Oct. 2, 2020).

89. Analysis of both of these factors demonstrates an unlawful delegation of power to Defendants: (1) the breadth of subjects of their power include, according to them, to restrict even healthy people from leaving their homes and to shutter their healthy and healthful businesses, among other things; and (2) the duration of delegated power is indefinite (but at least eight months and counting).

90. The delegation at issue in this case, to the extent it exists, constitutes an unlawful delegation of legislative power to the executive and is therefore unconstitutional under the Missouri Constitution which prohibits exercise of the legislative power by the executive branch.

91. A decision to strike down the Safer at Home Order, as it applies to restaurants, would still leave Defendants options for enacting whatever legislation they see fit:

Our decision (striking down executive orders) leaves open many avenues for the Governor and Legislature to work together to address this challenge and we hope that this will take place. *See Gundy v United States*, 588 US __, __; 139 S. Ct. 2116, 2145, 204 L. Ed. 2d 522 (Gorsuch, J., dissenting) (“Respecting the separation of powers forecloses no substantive outcomes. It only requires us to respect along the way one of the most vital of the procedural protections of individual liberty found in our Constitution.”).

Midwest Inst. of Health, PLLC v. Governor of Mich. (In re Certified Questions from the United States Dist. Court), No. 161492, 2020 Mich. LEXIS 1758, at *2 n.1 (Oct. 2, 2020).

COUNT IV: VIOLATION OF RIGHT TO PROCEDURAL DUE PROCESS UNDER THE MISSOURI CONSTITUTION

92. Plaintiffs restate and incorporate by reference the allegations in the preceding paragraphs as if fully set forth herein.

93. The Due Process Clause of the Missouri Constitution requires that in order to deprive a person of a property interest, the person must receive notice and an opportunity for a hearing appropriate to the nature of the case.

94. Moreover, due process contemplates the opportunity to be heard at a meaningful time and in a meaningful manner.

95. Defendants' Safer at Home Order shuts the doors to Plaintiffs' restaurants, which are clearly property interests, and it does so without the opportunity to be heard at a meaningful time and in a meaningful manner. The only hearings (which are court hearings like the one in this case) that are available are post-deprivation, after the damage has been done. Plaintiff restaurants should at the very least be afforded pre-deprivation notice and meaningful hearings.

96. The Safer at Home Order thus violates Plaintiffs' constitutional right to procedural due process.

COUNT V: EQUAL PROTECTION

97. Plaintiffs restate and incorporate by reference the allegations in the preceding paragraphs as if fully set forth herein.

98. The equal protection clause of the Missouri Constitution provides "that all persons are created equal and are entitled to equal rights and opportunity under the law." Mo. Const. art. I, sec. 2.

99. Defendants' Safer at Home Order bears no reasonable relationship to a legitimate state purpose.

100. Defendants close the doors to restaurants, but schools, churches, nail salons and malls remain open. A casino or concert hall can open if it submits a plan and the plan is approved; restaurants are not even given this option.

101. Restaurants are singled out among businesses, to their detriment—a situation the Equal Protection Clause exists to remedy. Similarly situated businesses are treated differently.

102. Defendants do not point to any instance of COVID-19 spread at Plaintiffs' institutions, whose owners and managers have worked hard to keep their employees and patrons safe.

103. Instead, Defendants prophylactically close the doors to Plaintiffs restaurants, without proper authority, because of their own unstated and undebated (unilateral) thoughts on how to fight the pandemic.

104. This unequal and unfounded treatment of restaurants is without a rational basis and thereby violates the Missouri Constitution's Equal Protection Clause.

COUNT VI: FREEDOM OF ASSEMBLY AND ASSOCIATION

105. Plaintiffs restate and incorporate by reference the allegations in the preceding paragraphs as if fully set forth herein.

106. Article I, Sections 8 and 9 of the Constitution of the State of Missouri guarantee freedom of assembly and association. *Courtway v. Carnahan*, 985 S.W.2d 350, 352 (Mo. Ct. App. 1998).

107. The right to freedom of assembly is infringed upon as Plaintiffs are prohibited from gathering with others for the purpose of providing a meal and conversation.

108. Further, the rights of the community to freely assemble are also infringed upon as they are restricted from gathering at the Plaintiffs' place of business for whatever purpose they may choose, including engaging in speech.

109. The right to free association is also infringed upon because it prohibits Plaintiffs and others from gathering and engaging in the expression and advancement of shared beliefs, and

for educational, religious, cultural and other exchanges of ideas.

110. Accordingly, the Safer at Home Order restricts the right to associate to engage in activities protected by the Missouri Constitution. “Infringements . . . may be justified by regulations adopted to serve compelling state interests, unrelated to the suppression of ideas, that cannot be achieved through means less restrictive of associational freedoms.” *Roberts v. U.S. Jaycees*, 468 U.S. 609, 623 (1984).

111. Even if Defendants may be able to show a compelling state interest, it is clear that the interest can “be achieved through means less restrictive” given that less restrictive means have been applied to other area businesses, including malls, nail salons, and entertainment venues.

112. The Safer at Home Order thus violates the Constitution of the State of Missouri’s guarantees of freedom of assembly and association.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request this Court:

- (a) Enter a temporary restraining order, preliminary injunction and permanent injunction enjoining Defendants from enforcing the Safer at Home Order against Plaintiffs in the operation of their restaurants and their members’ restaurants;
- (b) Declare that the Safer at Home Order is unlawful and null and void regarding its rules for indoor operations of restaurants, for the reasons stated in the foregoing counts;
- (c) Award Plaintiffs their costs incurred in this matter; and
- (d) Award such further relief as the Court deems just and proper.

Respectfully submitted,

OTTSEN, LEGGAT AND BELZ, L.C.

By: /s/ Timothy Belz

Timothy Belz #MO-31808

J. Matthew Belz #MO-61088

112 South Hanley, Second Floor

St. Louis, Missouri 63105-3418

Phone: (314) 726-2800

Facsimile: (314) 863-3821

tbelz@olblaw.com

jmbelz@olblaw.com

Mary Elizabeth Coleman #MO-61419

112 South Hanley, Second Floor

St. Louis, Missouri 63105-3418

Phone: (314) 726-2800

Facsimile: (314) 863-3821

colemanme@gmail.com

MCMAHON BERGER, P.C.

By: /s/ James N. Foster, Jr.

James N. Foster, Jr. #MO 28231

2730 N. Ballas Rd., Suite 200

St. Louis, MO 63131

Phone: (314) 567-7350

Facsimile (314) 567-5968

foster@mcmahonberger.com

VERIFICATION

State of Missouri)
County of St.) SS
Louis)

I, Alan Richman, first being duly sworn, on oath state that I have read the foregoing Verified Petition and certify that the statements set forth in this instrument as related to the restaurant(s) or association operated by my business and as related to employees who work for those restaurants are true and correct, except as to matters therein stated to be on information and belief and as to such matters I certify as aforesaid that I verily believe the same to be true.

Date: 11/17/20

Alan Richman
Name: Alan Richman
Title: Owner

Sworn to and subscribed before me this
17th day of November, 2020.

Courtney Rose Patterson
Notary Public



VERIFICATION

STATE OF MISSOURI)

County of ST LOUIS) SS)

I, Derek Deane,

first being duly sworn, on oath state that I have read the foregoing Verified Petition and certify that the statements set forth in this instrument as related to the restaurant(s) or association operated by my business and as related to employees who work for those restaurants are true and correct, except as to matters therein stated to be on information and belief and as to such matters I certify as aforesaid that I verily believe the same to be true.

Date: 11/17/20

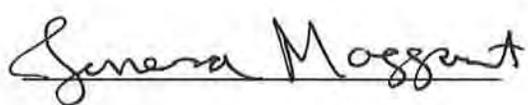


Name: Derek S. Deane

Title: MANAGING

Sworn to and subscribed before me this

17th day of November, 2020.



Notary Public

JENESA MAGGART
Notary Public - Notary Seal
State of Missouri
Commissioned for St. Louis County
My Commission Expires: June 16, 2023
Commission Number: 15413314

VERIFICATION

State of Missouri)
County of St.) SS
Charles)

I, James B Komorek, first being duly sworn, on oath state that I have read the foregoing Verified Petition and certify that the statements set forth in this instrument as related to the restaurant(s) or association operated by my business and as related to employees who work for those restaurants are true and correct, except as to matters therein stated to be on information and belief and as to such matters I certify as aforesaid that I verily believe the same to be true.

Date: 11-17-2020

James B Komorek
Name: James B. Komorek
Title: Partner

Sworn to and subscribed before me this

17th day of November, 2020.

Jacob W Stewart

Notary Public

JACOB W. STEWART
Notary Public - Notary Seal
State of Missouri
Commissioned for St. Charles County
My Commission Expires: May 27, 2023
Commission Number: 19658382

VERIFICATION

State of Missouri

County of St. Louis) SS

I, James M Ficca Jr, first being duly sworn, on oath state that I have read the foregoing Verified Petition and certify that the statements set forth in this instrument as related to the restaurant(s) or association operated by my business and as related to employees who work for those restaurants are true and correct, except as to matters therein stated to be on information and belief and as to such matters I certify as aforesaid that I verily believe the same to be true.

Date: 11/17/2020

Name: James M Ficca Jr

Title: OWNER

Sworn to and subscribed before me this 17th day of November, 2020.

Jenesa Maggart
Notary Public



VERIFICATION

State of Missouri)

County of St. Louis) SS

I, James M Fiala Jr, first being duly sworn, on oath state that I have read the foregoing Verified Petition and certify that the statements set forth in this instrument as related to the restaurant(s) or association operated by my business and as related to employees who work for those restaurants are true and correct, except as to matters therein stated to be on information and belief and as to such matters I certify as aforesaid that I verily believe the same to be true.

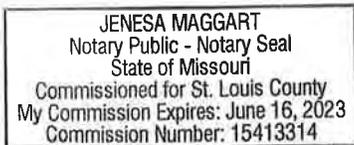
Date: 11/17/20

Name: James M Fiala Jr

Title: OWNER

Sworn to and subscribed before me this 17th day of November, 2020.

Jenesa Maggart
Notary Public



VERIFICATION

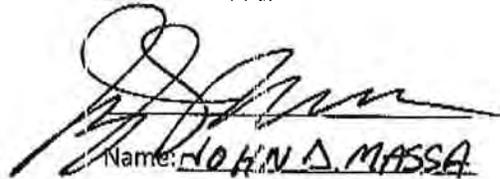
State of Missouri

) SS

County of St. Louis

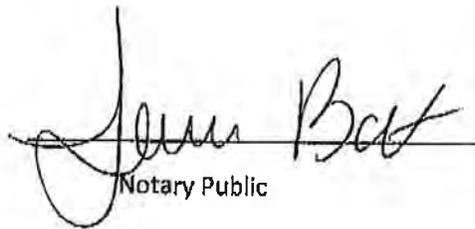
I, JOHN A. MASSA, first being duly sworn, on oath state that I have read the foregoing Verified Petition and certify that the statements set forth in this instrument as related to the restaurant(s) or association operated by my business and as related to employees who work for those restaurants are true and correct, except as to matters therein stated to be on information and belief and as to such matters I certify as aforesaid that I verily believe the same to be true.

Date: 11/17/20


Name: JOHN A. MASSA
Title: OWNER

Sworn to and subscribed before me this

17th day of November, 2020.


Notary Public



VERIFICATION

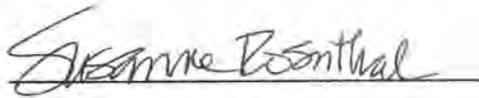
State of Missouri)
County of St. Louis) SS
)

I, John P. Rieker, first being duly sworn, on oath state that I have read the foregoing Verified Petition and certify that the statements set forth in this instrument as related to the restaurant(s) or association operated by my business and as related to employees who work for those restaurants are true and correct, except as to matters therein stated to be on information and belief and as to such matters I certify as aforesaid that I verily believe the same to be true.

Date: 11-17-20


Name: JOHN P. RIEKER
Title: OWNER

Sworn to and subscribed before me this
17th day of November, 2020.


Notary Public

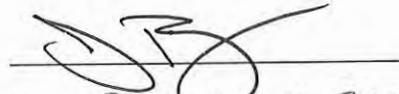


VERIFICATION

State of Missouri)
County of Jefferson) SS
)

I, JONATHAN FOGARTY, first being duly sworn, on oath state that I have read the foregoing Verified Petition and certify that the statements set forth in this instrument as related to the restaurant(s) or association operated by my business and as related to employees who work for those restaurants are true and correct, except as to matters therein stated to be on information and belief and as to such matters I certify as aforesaid that I verily believe the same to be true.

Date: 11/17/2020


Name: JONATHAN M FOGARTY
Title: MANAGING MEMBER

Sworn to and subscribed before me this
17 day of November, 2020.



Notary Public



VERIFICATION

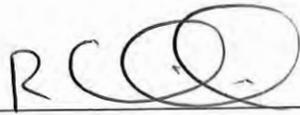
State of Missouri)
County of Jefferson) SS
)

I, JONATHAN FOGARTY, first being duly sworn, on oath state that I have read the foregoing Verified Petition and certify that the statements set forth in this instrument as related to the restaurant(s) or association operated by my business and as related to employees who work for those restaurants are true and correct, except as to matters therein stated to be on information and belief and as to such matters I certify as aforesaid that I verily believe the same to be true.

Date: 11/17/2020


Name: JONATHAN FOGARTY
Title: MANAGING MEMBER

Sworn to and subscribed before me this
17th day of November, 2020.


Notary Public

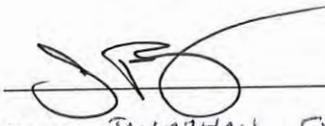


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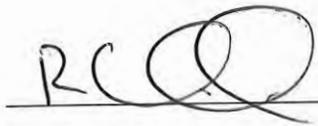
State of Missouri)
County of Jefferson) SS
)

I, JONATHAN FOGARTY, first being duly sworn, on oath state that I have read the foregoing Verified Petition and certify that the statements set forth in this instrument as related to the restaurant(s) or association operated by my business and as related to employees who work for those restaurants are true and correct, except as to matters therein stated to be on information and belief and as to such matters I certify as aforesaid that I verily believe the same to be true.

Date: 11/17/2020


Name: JONATHAN FOGARTY
Title: MANAGING MEMBER

Sworn to and subscribed before me this
17th day of November, 2020.


Notary Public



VERIFICATION

State of Missouri)
County of Jefferson) SS
)

I, JONATHAN FOGARTY, first being duly sworn, on oath state that I have read the foregoing Verified Petition and certify that the statements set forth in this instrument as related to the restaurant(s) or association operated by my business and as related to employees who work for those restaurants are true and correct, except as to matters therein stated to be on information and belief and as to such matters I certify as aforesaid that I verily believe the same to be true.

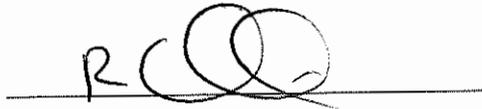
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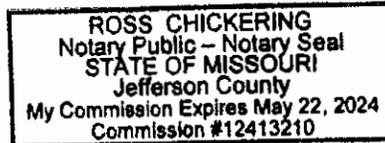
Name: JONATHAN FOGARTY

Title: MANAGING MEMBER

Sworn to and subscribed before me this
17 day of November, 2020.



Notary Public



VERIFICATION

State of Missouri)
County of Jefferson) SS
)

I, JONATHAN FOGARTY, first being duly sworn, on oath state that I have read the foregoing Verified Petition and certify that the statements set forth in this instrument as related to the restaurant(s) or association operated by my business and as related to employees who work for those restaurants are true and correct, except as to matters therein stated to be on information and belief and as to such matters I certify as aforesaid that I verily believe the same to be true.

Date: 11/17/2020


Name: JONATHAN FOGARTY
Title: MANAGING MEMBER

Sworn to and subscribed before me this
17th day of November, 2020.


Notary Public

ROSS CHICKERING
Notary Public - Notary Seal
STATE OF MISSOURI
Jefferson County
My Commission Expires May 22, 2024
Commission #12413210

VERIFICATION

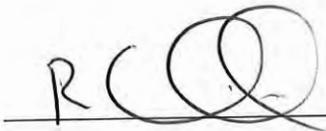
State of Missouri)
County of Jefferson) SS
)

I, JONATHAN FOGARTY, first being duly sworn, on oath state that I have read the foregoing Verified Petition and certify that the statements set forth in this instrument as related to the restaurant(s) or association operated by my business and as related to employees who work for those restaurants are true and correct, except as to matters therein stated to be on information and belief and as to such matters I certify as aforesaid that I verily believe the same to be true.

Date: 11/17/2020


Name: JONATHAN FOGARTY
Title: MANAGING MEMBER

Sworn to and subscribed before me this
17th day of November, 2020.


Notary Public



VERIFICATION

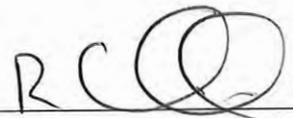
State of Missouri)
County of Jefferson) SS
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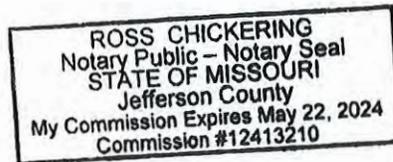
I, JONATHAN FOGARTY, first being duly sworn, on oath state that I have read the foregoing Verified Petition and certify that the statements set forth in this instrument as related to the restaurant(s) or association operated by my business and as related to employees who work for those restaurants are true and correct, except as to matters therein stated to be on information and belief and as to such matters I certify as aforesaid that I verily believe the same to be true.

Date: 11/17/2020


Name: JONATHAN FOGARTY
Title: MANAGING MEMBER

Sworn to and subscribed before me this
17th day of November, 2020.


Notary Public



VERIFICATION

State of Missouri)

City of St. Louis) SS

)

I, Loren Cox, first being duly sworn, on oath state that I have read the foregoing Verified Petition and certify that the statements set forth in this instrument as related to the restaurant(s) or association operated by my business and as related to employees who work for those restaurants are true and correct, except as to matters therein stated to be on information and belief and as to such matters I certify as aforesaid that I verily believe the same to be true.

Date: 11-17-20

[Signature]

Name: Loren Cox

Title: President

Sworn to and subscribed before me this

17 day of November, 2020.

Alyssa Brooke McCoy

Notary Public



VERIFICATION

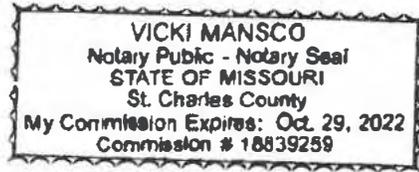
State of Missouri)
)
County of St. Charles)

I, Maribel ZEGAR, first being duly sworn, on oath state that I have read the foregoing Verified Petition and certify that the statements set forth in this instrument as related to the restaurant(s) or association operated by my business and as related to employees who work for those restaurants are true and correct, except as to matters therein stated to be on information and belief and as to such matters I certify as aforesaid that I verily believe the same to be true.

Date: 11-17-20

Maribel Zegar
Name: MARIBEL ZEGAR
Title: MANAGER

Sworn to and subscribed before me this
17 day of November, 2020.



Vicki Mansco

Notary Public

VERIFICATION

State of Missouri)
County of St.) SS
Louis)

I, MICHAEL D. ALTER, first being duly sworn, on oath state that I have read the foregoing Verified Petition and certify that the statements set forth in this instrument as related to the restaurant(s) or association operated by my business and as related to employees who work for those restaurants are true and correct, except as to matters therein stated to be on information and belief and as to such matters I certify as aforesaid that I verily believe the same to be true.

Date: Nov. 17, 2020

MICHAEL D. ALTER
Name: MICHAEL D. ALTER
Title: OWNER

Sworn to and subscribed before me this

17th day of November, 2020.

Courtney Rose Patterson

Notary Public



VERIFICATION

State of Missouri)

City of St. Louis) SS

)

I, PETE FERRETTI, first being duly sworn, on oath state that I have read the foregoing Verified Petition and certify that the statements set forth in this instrument as related to the restaurant(s) or association operated by my business and as related to employees who work for those restaurants are true and correct, except as to matters therein stated to be on information and belief and as to such matters I certify as aforesaid that I verily believe the same to be true.

Date: 11.17.2020

Pete Ferretti

Name: PETE FERRETTI

Title: SECRETARY

Sworn to and subscribed before me this

17th day of November, 2020.

Alyssa Brooke McCoy
Notary Public

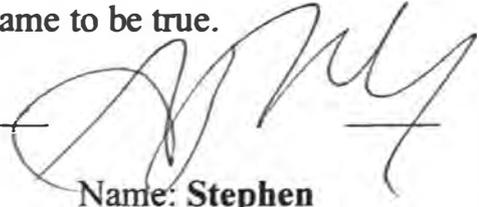


VERIFICATION

State of Missouri)
County of St.) SS
Louis)

I, Stephen Rauschenbach, first being duly sworn, on oath state that I have read the foregoing Verified Petition and certify that the statements set forth in this instrument as related to the restaurant(s) or association operated by my business and as related to employees who work for those restaurants are true and correct, except as to matters therein stated to be on information and belief and as to such matters I certify as aforesaid that I verily believe the same to be true.

Date: 11/17/2020

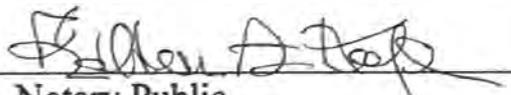


Name: Stephen

Rauschenbach

Title: President

Sworn to and subscribed before me this 17th day of November, 2020.


Notary Public



KATHLEEN A. KEEFE
My Commission Expires
September 10, 2022
St. Louis County
Commission #14630066

VERIFICATION

STATE OF MISSOURI)

) SS

COUNTY OF ST. LOUIS)

I, Patrick D. Long, first being duly sworn, on oath state that I have read the foregoing Verified Petition and certify that the statements set forth in this instrument as related to the restaurant(s) or association operated by my business and as related to employees who work for those restaurants are true and correct, except as to matters therein stated to be on information and belief and as to such matters I certify as aforesaid that I verily believe the same to be true.

Date: Nov 18, 2020

[Signature]
Name: PATRICK D. LONG
Title: President

Sworn to and subscribed before me this 18th day of November, 2020.

Jenesa Maggart

Notary Public

JENESA MAGGART
Notary Public - Notary Seal
State of Missouri
Commissioned for St. Louis County
My Commission Expires: June 16, 2023
Commission Number: 15413314

