

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION**

COMPLAINT

INTRODUCTION AND NATURE OF THE ACTION

- 1. Healthcare professionals must perform or refer for medical transition procedures.**

- 5. Covered entities must provide assurances of compliance and post notices of compliance.**

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2. Control over Facilities.

D. The effect on the Christian Medical & Dental Association.

E. The Effect on Franciscan Alliance.

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2. Required Insurance Coverage.

COUNT II

**Violation of the Administrative Procedure Act
Agency Action In Excess of Statutory Authority and Limitations**

COUNT III

**Violation of the Administrative Procedure Act
Agency Action that is Arbitrary, Capricious and an Abuse of Discretion**

B. Alleged by CMDA, Franciscan, and Specialty Physicians only

COUNT VI

**Violation of the First and Fifth Amendments of the United States
Constitution
Freedom of Speech and Due Process
Overbreadth**

COUNT VII

**Violation of the First and Fifth Amendments of the United States
Constitution
Freedom of Speech and Due Process
Void for Vagueness**

COUNT VIII

**Violation of the First Amendment of the United States Constitution
Free Exercise Clause and Freedom of Speech
Unbridled Discretion**

COUNT X

**Violation of the First Amendment
Freedom of Speech
Expressive Association**

COUNT XIV

**Violation of the Fifth Amendment to the United States Constitution
Due Process Clause
Substantive Due Process**

COUNT XV

**Violation of the Fifth Amendment to the United States Constitution
Due Process and Equal Protection**

COUNT XVII

Unlawful Abrogation of Sovereign Immunity

V. PRAYER FOR RELIEF

VI. JURY DEMAND
