

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

COMPLAINT

Plaintiffs

Defendants

INTRODUCTION AND NATURE OF THE ACTION

Id.

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

Implementing Health Reform: HHS Proposes Rule Implementing Anti-Discrimination ACA Provisions (Contraceptive Coverage Litigation Update)

Id.

Id. *see also id.*

Id.

i.e.

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

7.

Washington v.

Glucksberg

Barsky v. Bd. of Regents of Univ. of

N. Y.

See, e.g. Murk v. Scheele

per curiam

See Garcia v. Tex. State Bd. of Med. Exam'rs

Id.

Id.

Id.

Id.

Jacobs v.

Theimer

Wilson v. Scott

*Malpractice: physician's duty to inform patient of
nature and hazards of disease or treatment*

2. Control over Facilities.

See, e.g.

Perspective

Texas Medicaid and CHIP in

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

Ethics Statement

Transgender Identification

Id.

E. The Effect on Franciscan Alliance.

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The Ethical and Religious Directives for Catholic

Healthcare Services

1.

2. Required Insurance Coverage.

Brown

See Agency for

Int'l Dev. v. Alliance for Open Soc'y Int'l, Inc.

COUNT II

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

id.

Id.

COUNT III

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

id.

Id.

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

see also id.

COUNT VI

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

see also id.

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**

et seq

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

See NFIB

V. PRAYER FOR RELIEF

VI. JURY DEMAND

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Franciscan Alliance, Inc., Specialty
Physicians of Illinois, LLC*
