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

	COMPLAINT
Plaintiffs	
Defendants	

INTRODUCTION AND NATURE OF THE ACTION

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)

see also id.

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

Washington	\boldsymbol{V}
VV asimie ton	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.

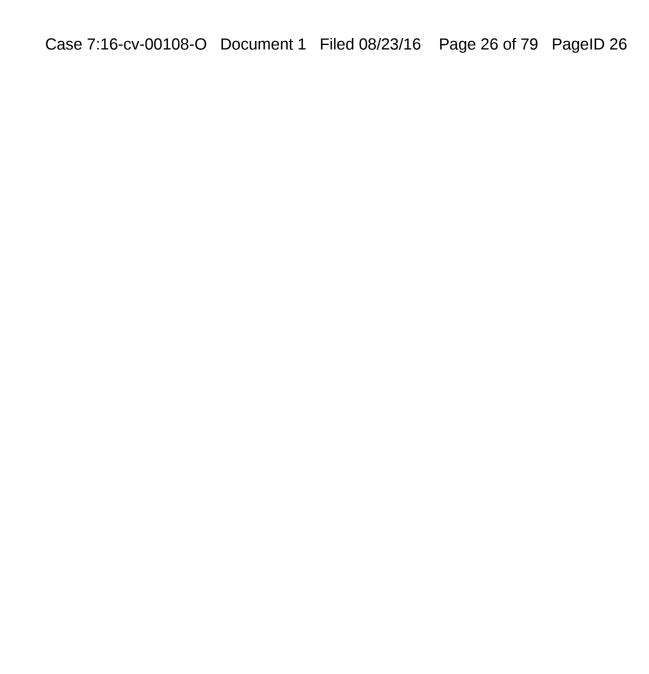
Jacobs v.

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.

Texas Medicaid and CHIP in

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



E. The Effect on Franciscan Alliance.

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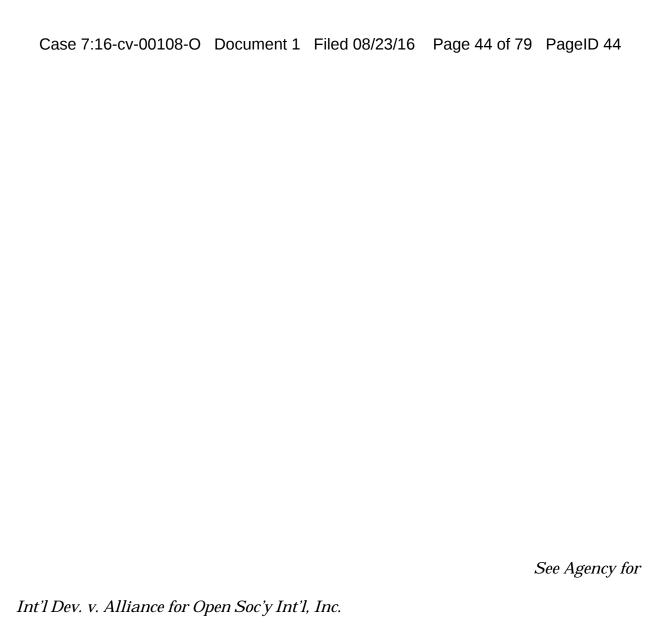
The Ethical and Religious Directives for Catholic

Healthcare Services

1.

2. Required Insurance Coverage.

Brown



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

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

COUNT XIV

Violation of the Fifth Amendment to the United States Constitution

Due Process Clause

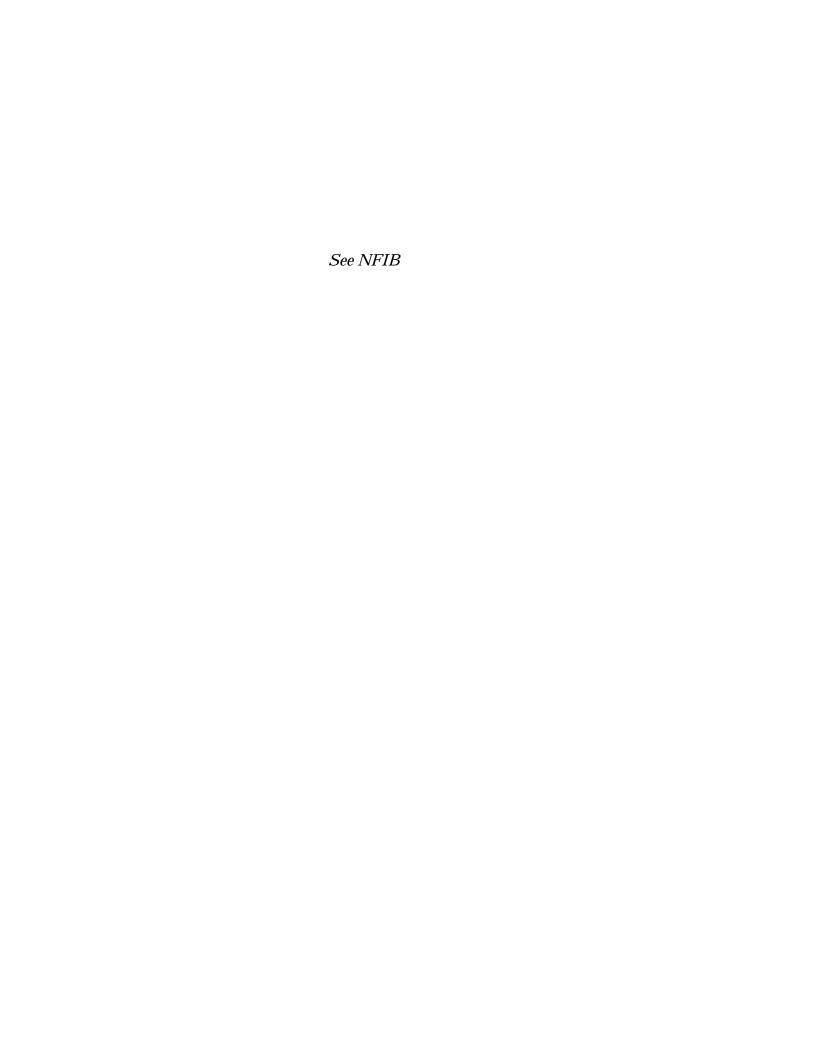
Substantive Due Process

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

Counsel for Plaintiffs Christian Medical & Dental Associations, Franciscan Alliance, Inc., Specialty Physicians of Illinois, LLC