

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

AARON L. LEWIS, KEEDRAN FRANKLIN,
EARLE FISHER, CATHERINE LEWIS,
AND CHARLINE TRAMEL,

Plaintiffs,

v.

Case No. _____

THE CITY OF MEMPHIS and
ELVIS PRESLEY ENTERPRISES,
INCORPORATED,

Defendants.

COMPLAINT

Plaintiffs bring this Complaint against the Defendants for equitable relief and damages resulting from racial profiling and intentional race discrimination. For their Complaint, the Plaintiffs allege as follows:

PRELIMINARY STATEMENT

This is a Civil Rights complaint for relief brought by Plaintiffs, United States citizens. The Plaintiffs in this lawsuit are African-American citizens of the United States and are entitled to the privileges and protections of the Constitution of the United States, the laws of this country and of the State of Tennessee.

The Plaintiffs were subjected to discriminatory treatment on the basis of their race in a place of public accommodation, when they were denied equal access to the public candlelight vigil at Graceland, and the surrounding sidewalks, streets and businesses on August 15, 2016. The Plaintiffs were denied equal access to the grounds of Graceland and the public sidewalks

and streets surrounding Graceland, which are open to the public, through a conspiracy between Elvis Presley Enterprises (the entity that operates Graceland) and the Memphis Police Department, in violation of their federal and state Constitutional rights and the laws of the United States and of the State of Tennessee. Plaintiffs seek redress for Defendants' wrongful actions pursuant to 42 U.S.C. §§ 1981, 1983, 1985 and 1986; the Tennessee Human Rights Act, Tenn. Code Ann. § 4-21-101 et seq. ("THRA"), and federal and state tort law.

JURISDICTION AND VENUE

1. This is an action concerning a federal question for damages and equitable relief, based on discrimination in a place of public accommodation undertaken by the Defendants against the Plaintiffs based on their race. The Plaintiffs all reside in Memphis, Shelby County, Tennessee. Elvis Presley Enterprises, Incorporated does business within Tennessee and the acts complained of occurred exclusively within Tennessee. Defendant, City of Memphis, (hereinafter referred to as "Defendant" or "City of Memphis") is a municipal entity, located in Shelby County, Tennessee, recognized by the State of Tennessee as a properly organized and legal municipal entity, which operates the Memphis Police Department.
2. Federal jurisdiction and venue are proper under 28 U.S.C. §§ 1331 and 1343, and 28 U.S.C. § 1391.

PARTIES

3. Plaintiff, Aaron L. Lewis, is an African-American citizen of the United States and a resident of Memphis, Tennessee.
4. Plaintiff, Keedran Franklin, is an African-American citizen of the United States and a resident of Memphis, Tennessee.

5. Plaintiff, Earle Fisher, is an African-American citizen of the United States and a resident of Memphis, Tennessee.
6. Plaintiff, Catherine J. Lewis is an African-American citizen of the United States and a resident of Memphis, Tennessee.
7. Plaintiff, Charline Tramel is an African-American citizen of the United States and a resident of Memphis, Tennessee.
8. Defendant, Elvis Presley Enterprises, Incorporated, is a Tennessee corporation formed in 1981 under the terms of a testamentary trust created by Elvis Presley and can be served with process through their registered agent National Corporate Research, LTD., Inc., STE B, 992 Davidson Drive, Nashville, TN, 37205-1051.
9. Defendant, City of Memphis, is a municipal entity, located in Shelby County, Tennessee, recognized by the State of Tennessee as a properly organized and legal municipal entity, which operates the Memphis Police Department and can be served with process through the City Attorney, Bruce McMullen, at his office located at 125 North Main Street, Suite 336, Memphis, TN 38103.

FACTUAL STATEMENT

10. On August 15, 2015, Rev. Earle J. Fisher went to Graceland to attend the public candlelight vigil. Rev. Fisher brought a candle to attend the public candlelight vigil and got in line behind a group of white citizens who were in line to attend the public vigil. Rev. Fisher was denied entry on Elvis Presley Boulevard as he attempted to pass through an entry way near Graceland. The white citizens in line with him were all allowed to enter, however, Rev. Fisher was stopped by a member of the Memphis Police Department as he tried to enter. Rev. Fisher explained that he was present to attend the

public vigil. That officer along with another Memphis Police Department officer told Rev. Fisher that he was not allowed to attend the public vigil and told Rev. Fisher to leave the premises, at which time Rev. Fisher left under protest.

11. On August 15, 2015, Habiba-Charline Tramel was on Elvis Presley Boulevard to attend the public candlelight vigil. When Ms. Tramel was leaving the event, she was walking out as directed by MPD. As she was walking out, she stopped on the public sidewalk and was saying “black lives matter,” in a non-threatening manner. Ms. Tramel was not part of any group or organized protest and was not causing a disturbance. An officer with the Memphis Police Department approached her and told her that she couldn’t stand on the public sidewalk. Ms. Tramel was escorted down the street and to the other side of the street.

12. On August 15, 2016, Catherine J. Lewis went to Graceland to attend the public candlelight vigil. She walked from Piccadilly’s cafeteria, located on Elvis Presley Boulevard, north and on the west side of the street, to Graceland. Police officers with the Memphis Police Department were stationed on Elvis Presley Boulevard. The police officers were setting up barricades, but the barricades were not yet fully in place. Ms. Lewis walked down the sidewalk to the Graceland gift shop to look around. Ms. Lewis bought a gift for her daughter at the gift shop. Ms. Lewis then left the gift shop and sat on a bench near the gift shop. When the program began, Ms. Lewis walked around with some of her friends. As they walked around the public vigil they were being closely watched by police officers with the Memphis Police Department. After a while, Ms. Lewis and her companions decided to leave. As Ms. Lewis was leaving, she began saying “black lives matter,” in a non-threatening manner without intending to cause or causing a

disturbance, in fact. As soon as Ms. Lewis said “black lives matter,” two police officers walked over and told her to leave. When Ms. Lewis did not immediately move, the officers took her by her arms, one on each side, and removed her from the parking lot where she was standing.

13. On August 15, 2016, Ian Jeffries went to Graceland to attend the public candlelight vigil. On his way to the public candlelight vigil, Mr. Jeffries was stopped by police officers with the Memphis Police Department at a barricade. An officer with the Memphis Police Department physically put his hands on Mr. Jeffries and told him that he was going to jail if he attempted to attend the public vigil.
14. On August 15, 2015, Aaron L. Lewis was on Elvis Presley Boulevard to attend the public candlelight vigil. He attempted to gain entry to the event numerous times and was denied each time by police officers with the Memphis Police Department. Mr. Lewis asked several officers why they were denying him access to the public vigil, but was not given a response. Mr. Lewis saw many white citizens who were allowed entry to the public vigil, but Mr. Lewis was not allowed to attend the public vigil because of his race.
15. On August 15, 2015, Keedran Franklin was on Elvis Presley Boulevard to attend the candlelight vigil. He attempted to gain entry to the event numerous times and was denied each time by police officers with the Memphis Police Department. Mr. Franklin saw many white citizens who were allowed entry to the public vigil, but Mr. Franklin was not allowed to attend the public vigil because of his race.
16. Upon information and belief, the Memphis Department coordinated with Elvis Presley Enterprises to use the Memphis Police Department to provide security for the public candlelight vigil on August 15, 2016.

17. Upon information and belief, Elvis Presley Enterprises conspired, agreed, planned, coordinated, and directed the Memphis Police Department, for the purpose of depriving Plaintiffs of their civil rights, to allow white citizens to attend the public vigil, but to deny access to African-Americans who wanted to attend the public vigil. The decision as to which citizens were allowed to attend the public vigil and which citizens were denied access to the public vigil, was based on the race of the citizens, wherein white citizens were allowed to attend the public vigil and African-American or Black citizens were denied access to the public vigil and surrounding areas, which are open to the public.

COUNT I
RACIAL DISCRIMINATION
IN A PLACE OF PUBLIC ACCOMMODATION
IN VIOLATION OF 42 U.S.C. § 2000a

18. Plaintiffs incorporate the preceding and foregoing paragraphs as if fully stated herein for this claim of relief.

19. Plaintiffs had and have a right to full and equal enjoyment of Defendant's business, Graceland, a place of public accommodation generally open to the public.

20. Plaintiffs were denied that right based on their race. Plaintiffs attempted to attend the public candlelight vigil and enjoy the full benefits and enjoyment of a public accommodation, but were denied the full benefits or enjoyment of a public accommodation, and such opportunities were available to similarly situated persons outside their protected class who received full benefits and/or were treated better. Defendants, the City of Memphis Police Department, under the direction of Elvis Presley Enterprises, required black citizens attempting to attend the public vigil to remain in certain fenced off areas, and black citizens were not allowed access to Graceland or the sidewalk surrounding Graceland, which is open to the public. Other similarly situated

white citizens were allowed access to Graceland and to the public sidewalks surrounding Graceland.

21. Defendants' actions were discriminatory, arbitrary and capricious, and constituted a disparity in treatment between Plaintiffs and other white citizens who were allowed to attend the public candlelight vigil and the surrounding areas, which are open to the public.
22. Defendants' denial of Plaintiffs' rights constitutes racial discrimination in violation of 42 U.S.C. § 2000a.

COUNT II
DISCRIMINATION IN CONTRACTUAL RELATIONS
IN VIOLATION OF 42 U.S.C. § 1981

23. Plaintiffs incorporate the preceding and foregoing paragraphs as if stated herein for this claim of relief.
24. Plaintiffs are members of a protected class based on race.
25. Defendants intended to, and did, discriminate based on the race of the Plaintiffs.
26. Defendants discriminated against Plaintiffs based on their race and interfered with the Plaintiffs ability to make, perform, modify, or terminate contracts, or enjoy all the benefits, privileges, terms and conditions of the contractual relationship with Defendants, and specifically were treated dissimilarly based on race and ultimately refused service and not permitted to enter upon the grounds of Graceland, or the public sidewalks and public areas surrounding Graceland.
27. By the Defendants' actions described herein, Plaintiffs were deprived of the equal enjoyment of the benefits, privileges, terms, and conditions of a contractual relationship on the same basis as white persons, on the basis of race.

28. Further, because Defendants' illegal discrimination was intentional, the Plaintiffs have a cause of action under the equal benefits clause of Section 1981.
29. Defendants excluded the Plaintiffs from enjoying an environment at a place of public accommodation that should be free from a hostile and intimidating environment, based on race, in violation of Section 1981.
30. As a direct and proximate result of the actions of Defendant as described herein, Plaintiffs have suffered, continue to suffer, and will, in the future, suffer great and irreparable loss and injury including, but not limited to, humiliation, embarrassment, emotional distress, and mental anguish.
31. Defendant's actions were willful, wanton, intentional and in knowing violation of their obligations and duties under 42 U.S.C. § 1981 and were taken with the callous disregard of the probable detrimental, emotional and economic consequences to the Plaintiff. Therefore Plaintiffs are entitled to recover punitive damages to punish Defendant and to deter them and others from such conduct in the future.
32. Defendants denial of Plaintiffs' legal rights constitutes discrimination in violation of 42 U.S.C. § 1981.

COUNT III
CONSPIRACY TO DEPRIVE PLAINTIFFS OF THEIR CIVIL RIGHTS
IN VIOLATION OF 42 U.S.C. § 1985

33. Plaintiffs incorporate the preceding and foregoing paragraphs as if stated herein for this claim of relief.
34. Upon information and belief, Elvis Presley Enterprises met with officials from the City of Memphis and the Memphis Police Department to develop a plan to use Memphis Police

Department officers to provide security for the public candlelight vigil at Graceland on August 15, 2016.

35. On August 15, 2016, the City of Memphis Police Department deployed dozens of uniformed police officers on and around Graceland with a plan to deprive the Plaintiffs of their civil rights, and in fact, did deprive the Plaintiffs of their civil rights by denying the Plaintiffs access to the public candlelight vigil, based solely on their race.
36. Upon information and belief, Elvis Presley Enterprises did not employ a private security company to provide security at the public candlelight vigil. Rather, Elvis Presley Enterprises had one employee who was directing and/or coordinating with the Memphis Police Department and using the Memphis Police Department as Graceland's security force for the public candlelight vigil.
37. Upon information and belief, Elvis Presley Enterprises and the Memphis Police Department coordinated before the public candlelight vigil and at the public candlelight vigil, to provide security for Graceland and the surrounding public areas, and to execute a plan to allow white citizens to attend the public candlelight vigil and to deny African-American citizens access to the public candlelight vigil, the grounds of Graceland and to the areas surrounding Graceland, including public sidewalks, public streets and businesses open to the public.
38. The Defendants present at the aforementioned incident participated in a common design through a concert of action to allow white citizens to attend the public candlelight vigil and to deny African-American citizens access to the public candlelight vigil, the grounds of Graceland and to the areas surrounding Graceland, including public sidewalks, public streets and businesses open to the public.

39. In committing the aforementioned acts, each Defendant directly and proximately injured, damaged, and caused emotional distress to the Plaintiffs as described herein.

COUNT IV
VIOLATION OF 42 U.S.C. § 1986

40. Plaintiffs incorporate the preceding and foregoing paragraphs as if stated herein for this claim of relief.

41. Commencing with the planning and coordinating between Elvis Presley Enterprises and the City of Memphis, and continuing on August 15, 2016, Defendants, and each of them knew and understood that the Plaintiffs were being subjected to a deprivation of their constitutional rights and were in the position and had the duty and the authority to intervene to prevent the wrongdoing committed by the Defendants against the Plaintiffs, but failed to do so.

42. By virtue of the foregoing, Defendants, and each of them, violated 42 U.S.C. § 1986.

43. As a direct and proximate result of the foregoing, the Plaintiffs have been damaged as recited above and demands and are entitled to damages as recited herein, including, but not limited to, general and punitive damages (except as to the City of Memphis) and attorneys' fees.

COUNT V
VIOLATION OF THE TENNESSEE HUMAN RIGHTS ACT

44. Plaintiffs incorporate the preceding and foregoing paragraphs as if stated herein for this claim of relief.

45. Defendants, acting through their various officers, administrators, and agents, engaged in unlawful practices, acts, and policies in violation of the Tennessee Human Rights Act,

T.C.A. § 4-21-101 et seq. by intentionally and willfully discriminating against the Plaintiffs in their employment on account of Plaintiffs' race.

46. As a direct result of Defendants' conduct, Plaintiffs have been detained, denied of their liberty and property, and have suffered substantial damages, including humiliation, embarrassment, emotional distress and mental anguish.

COUNT VI
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

47. Plaintiffs incorporate the preceding and foregoing paragraphs as if stated herein for this claim of relief.

48. The conduct of the Defendants described above resulted in the intentional infliction of emotional distress against Plaintiffs.

49. The Defendants' unlawful discriminatory conduct against Plaintiffs resulted in Plaintiffs' detention and violation of their constitutionally protected rights. The Defendants' actions were intentional.

50. The Defendants' conduct was so outrageous so as not to be tolerated in a civilized society.

51. The Defendants' conduct has resulted in serious mental injury and suffering to Plaintiffs, as described herein.

DEMAND FOR JURY TRIAL

Plaintiff demands a trial by jury.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray that there be judgment rendered herein in favor of Plaintiffs and against Defendants as follows.

- a. Reasonable damages to compensate Plaintiffs for the humiliation, embarrassment, emotional distress and mental anguish, as described herein, suffered as a result of Defendants' activities;
- b. Appropriate injunctive and declaratory relief;
- c. Punitive damages in an amount to be determined at trial;
- d. Court costs, including discretionary costs;
- e. An award of reasonable attorneys' fees; and
- f. Such other relief as the Court may deem appropriate.

Respectfully submitted,

APPERSON CRUMP, PLC

s/Bruce S. Kramer

Bruce S. Kramer (#7472)

Scott A. Kramer (# 19462)

6070 Poplar Avenue, 6th Floor

Memphis, Tennessee 38119

(901) 756-6300

Attorneys for Plaintiffs

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

(b) County of Residence of First Listed Plaintiff (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

DEFENDANTS

County of Residence of First Listed Defendant (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff, 2 U.S. Government Defendant, 3 Federal Question (U.S. Government Not a Party), 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, PTF DEF, Incorporated or Principal Place of Business In This State, Incorporated and Principal Place of Business In Another State, Foreign Nation

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Table with 5 columns: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES. Contains various legal categories and checkboxes.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding, 2 Removed from State Court, 3 Remanded from Appellate Court, 4 Reinstated or Reopened, 5 Transferred from Another District, 6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): Brief description of cause:

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE DOCKET NUMBER

DATE SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
 United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
 United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
 Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
 Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If the nature of suit cannot be determined, be sure the cause of action, in Section VI below, is sufficient to enable the deputy clerk or the statistical clerk(s) in the Administrative Office to determine the nature of suit. If the cause fits more than one nature of suit, select the most definitive.
- V. Origin.** Place an "X" in one of the six boxes.
 Original Proceedings. (1) Cases which originate in the United States district courts.
 Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.
 Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
 Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
 Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
 Multidistrict Litigation. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407. When this box is checked, do not check (5) above.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
 Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
 Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.
- Date and Attorney Signature.** Date and sign the civil cover sheet.

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____ .

I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____ , and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____ , who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____ ; or

I returned the summons unexecuted because _____ ; or

Other *(specify)*: _____ .

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____ .

I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____ , and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____ , who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____ ; or

I returned the summons unexecuted because _____ ; or

Other *(specify)*: _____ .

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc: