

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

---

**ALEXANDER PARKER,**

**Plaintiff,**

**v.**

**ELIZABETH S. BECKLEY, GEORGE  
W. EDMONDSON, NINTH JUDICIAL  
DISTRICT, and MAGISTERIAL  
DISTRICT 09-1-02,**

**Defendants.**

---

:  
:  
:  
: **No. 19-cv-255**  
:  
: **JURY TRIAL DEMANDED**  
:  
:  
:  
:  
:  
:  
:

**AMENDED COMPLAINT**

**I. PRELIMINARY STATEMENT**

1. The United States Constitution prohibits state and local officials from discriminating against or detaining people based on their national origin or race. On May 23, 2017, defendant Elizabeth S. Beckley, a magisterial district judge in Camp Hill, Pennsylvania, violated this fundamental principle when she ordered defendant George W. Edmondson, a constable, to detain plaintiff Alexander Parker—on his wedding day.

2. Mr. Parker, who is Latino with a dark complexion, was born in Guatemala. As an infant, he was brought to the United States by an American family as a prospective adoptee. He was raised in the United States and has never left. Nor has he relinquished the Lawful Permanent Resident status he obtained in his infancy.

3. In 2017, while waiting to receive his “green card” documenting his long-held status as a lawful permanent resident of the United States, the only form of photo identification Mr. Parker possessed was a consular identification card issued by the Guatemalan Consulate. When he and his then-fiancée Krisha Schmick went to apply for a marriage license, Mr. Parker had no problem obtaining the license upon presenting that consular identification.

4. Mr. Parker and Ms. Schmick received a different reception when they went to defendant Beckley’s office to solemnize their marriage. After Mr. Parker gave Beckley’s staff the consular identification card, Beckley and another official, defendant George W. Edmondson, told Mr. Parker he was not free to leave. Claiming that Mr. Parker was not lawfully present in the United States, defendant Beckley contacted U.S. Immigration and Customs Enforcement officers. She refused to perform the marriage ceremony and decided with defendant Edmondson to detain Mr. Parker in her office.

5. Hours later, immigration officers confirmed what defendant Beckley had no legitimate basis to doubt: that Mr. Parker was lawfully present in the country. Because they had already paid a fee and had brought with them two family members who had made a long drive from New Jersey, Mr. Parker and Ms. Schmick went through with their wedding ceremony before defendant Beckley. Having their wedding performed by a judge who had wrongly assumed Mr. Parker was

unlawfully in the country irreversibly tainted what should have been a joyous occasion.

6. Defendant Beckley's actions—refusing to perform Mr. Parker's marriage ceremony and instead detaining him—were the result of her intentionally discriminating against Mr. Parker on the basis of his national origin and/or race. This shocking conduct violated Mr. Parker's constitutional and federally protected rights and caused Mr. Parker emotional distress.

7. Mr. Parker brings this action under 42 U.S.C. § 1983 and Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d, seeking compensation for his harms and losses.

## **II. JURISDICTION AND VENUE**

8. This Court has jurisdiction over the subject matter of this Amended Complaint under 42 U.S.C. § 1983 and 28 U.S.C. §§ 1331, 1343(a)(3), and 1343(a)(4).

9. The events that gave rise to this Amended Complaint occurred in Camp Hill, Pennsylvania, within the Middle District of Pennsylvania, and venue is proper in this Court under 28 U.S.C. § 1391(b).

### III. PARTIES

10. Plaintiff Alexander Parker (“Mr. Parker”) was at the time of the incidents described in this Amended Complaint a resident of Carlisle, Pennsylvania. He is now a resident of Kissimmee, Florida.

11. Defendant Elizabeth S. Beckley is employed as the magisterial district judge for Magisterial District 09-1-02 in Camp Hill, Pennsylvania. At all relevant times, she acted under color of state law and in an administrative and non-judicial capacity. She is sued in her individual capacity for purposes of the claims pursuant to 42 U.S.C. § 1983.

12. Defendant George W. Edmondson is the elected constable for Hampden Township in Cumberland County, Pennsylvania. On May 23, 2017, he provided constable services at Magisterial District Court 09-1-02. At all relevant times, defendant Edmondson acted under color of state law. He is sued in his individual capacity for purposes of the claims pursuant to 42 U.S.C. § 1983.

13. At all relevant times, defendants Beckley and Edmondson acted in concert and conspiracy and were jointly and severally responsible for the harms caused to Mr. Parker.

14. Defendant Ninth Judicial District consists of the Court of Common Pleas of Cumberland County and the magisterial districts of Cumberland County. The Ninth Judicial District is a public entity that receives federal funds and,

accordingly, is subject to Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d. For purposes of Title VI, defendant Beckley is an appropriate person to address and remedy discrimination within the Ninth Judicial District.

15. Defendant Magisterial District 09-1-02 addresses matters arising under its statutorily granted jurisdiction in its assigned geographic area within Cumberland County. The judicial officer assigned to Magisterial District 09-1-02 also has authority to perform non-judicial functions, including, as relevant to this matter, officiating marriage ceremonies. Magisterial District 09-1-02 is a public entity that receives federal funds and, accordingly, is subject to Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d. For purposes of Title VI, defendant Beckley is an appropriate person to address and remedy discrimination within Magisterial District 09-1-02.

#### **IV. FACTUAL ALLEGATIONS**

##### **A. Mr. Parker's Background, His Consular Identification Card, and the Application for a Marriage License**

16. Mr. Parker was born in Guatemala in 1996.
17. His mother was unable to support him and gave him up for adoption.
18. When Mr. Parker was eight months old, a couple living in New Jersey decided to adopt him.
19. Based on a petition filed by his prospective adoptive parents, Mr. Parker entered the United States as a Lawful Permanent Resident.

20. Mr. Parker has resided in the United States continuously since before his first birthday. He has maintained his Lawful Permanent Resident status since that time.

21. Mr. Parker has never been back to Guatemala, and he speaks no Spanish.

22. For reasons unknown to Mr. Parker, the couple that intended to adopt him did not formalize his adoption, nor did they do so for two other children they brought to the United States.

23. During Mr. Parker's teen years, the couple that brought Mr. Parker to the United States relinquished their custody of him, and Mr. Parker passed into the custody of Bucks County Children and Youth Services ("CYS") in Bucks County, Pennsylvania.

24. Mr. Parker attended high school while in CYS custody and graduated in 2014.

25. During high school, Mr. Parker met Krisha Schmick.

26. In September 2016 Mr. Parker and Ms. Schmick began dating, and they quickly fell in love.

27. By October 2016, Mr. Parker and Ms. Schmick were engaged.

28. In early 2017, Mr. Parker moved into Ms. Schmick's home in Carlisle, Pennsylvania.

29. At the time, Mr. Parker did not have an unexpired form of photo identification. Before Mr. Parker's adoptive parents relinquished their custody of him, they had neglected to obtain an identification card confirming his Lawful Permanent Resident status.

30. Without confirmation of his status as a Lawful Permanent Resident, Mr. Parker could not obtain a state-issued photo identification card in Pennsylvania.

31. To address this issue, in 2016, a CYS caseworker assisted Mr. Parker in applying for proof of his Lawful Permanent Resident status—i.e., a “green card.”

32. While that application was pending, and in order to enable Mr. Parker to have valid photo identification, the CYS caseworker helped Mr. Parker obtain a consular identification card from the Guatemalan consulate.

33. Mr. Parker received the consular identification card in April 2017.

34. Consular identification cards are widely accepted as appropriate and valid forms of photo identification for numerous purposes, including obtaining a marriage license.

35. The Philadelphia Marriage License Bureau, for example, states on its website that applicants for a marriage license must, among other things, produce a current valid photo identification “in the form of either a driver's license; non-

driver's license; international driver's license; passport; military I.D.; resident alien card *or consulate card*.”<sup>1</sup>

36. After Mr. Parker received his consular identification, he and Ms. Schmick went to the Perry County courthouse in New Bloomfield, Pennsylvania to obtain a marriage license.

37. As part of the application process, Mr. Parker presented his consular identification.

38. The application was granted, and Mr. Parker and Ms. Schmick received a marriage license.

**B. Magisterial District Judges' Authority to Perform  
Marriage Ceremonies and Court Guidance  
Regarding Race and National Origin Discrimination**

39. In Pennsylvania, a marriage is not formalized until it is solemnized in a wedding ceremony.

40. Pennsylvania law grants solemnization authority to broad categories of individuals, including mayors, members of the clergy, and judges. 23 Pa. Cons. Stat. § 1503(a). Indeed, nearly any civilian can obtain legal authority to solemnize a marriage through a short, online application process.

---

<sup>1</sup> *Instructions for Obtaining a Marriage License in Philadelphia*, REGISTER OF WILLS – PHILA.GOV, [secureprod.phila.gov/wills/marriagelicense.aspx](https://secureprod.phila.gov/wills/marriagelicense.aspx) (emphasis added).



41. Magisterial district judges are one category of persons authorized to solemnize marriages. 23 Pa. Cons. Stat. § 1503(a)(1).

42. When performing marriage ceremonies, magisterial district judges and all other officials in Pennsylvania have constitutional and statutory responsibilities to avoid behaving in a fashion that discriminates on the basis of race, ethnicity or national origin.

43. As of May 2017, these responsibilities were well known to magisterial district judges in Cumberland County.

44. In July 2016, the Cumberland County Court of Common Pleas posted on its website a Policy on Non-Discrimination issued by the Supreme Court of Pennsylvania (“Policy”).<sup>2</sup> The Policy stated that no court personnel should discriminate on the basis of, among other things, race and national origin. Since 2013, the Administrative Office of Pennsylvania Courts (“AOPC”) has clarified that the Policy applies to constables and other “related staff” of the courts who are not court personnel.<sup>3</sup>

---

<sup>2</sup> *Policy on Non-Discrimination and Equal Employment Opportunity*, SUPREME COURT OF PENNSYLVANIA – UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA, Revised July 2016, [www.ccpa.net/DocumentCenter/View/25128/Non-Discrimination-Policy-Revised-7-2016?bidId](http://www.ccpa.net/DocumentCenter/View/25128/Non-Discrimination-Policy-Revised-7-2016?bidId).

<sup>3</sup> *Pennsylvania Unified Judicial System – Constable Policies, Procedures, and Standards of Conduct*, ADMINISTRATIVE OFFICE OF PENNSYLVANIA COURTS, May 2013, <http://www.pacourts.us/assets/files/resource-1059859/file-2699.pdf>.

45. In 2018, AOPC issued guidance confirming what was already clear from earlier non-discrimination policy statements: that inquiries into a person's immigration status based on the person's perceived national origin could be regarded as discriminatory and a violation of Title VI of the Civil Rights Act of 1964.

46. Consistent with this advisory, AOPC advised all court personnel not to inquire into a person's federal immigration status for any reason except for the rare circumstances in which that status would be relevant to a court matter.

**C. Defendant Beckley's Refusal to Perform a Marriage Ceremony and Defendants Beckley's and Edmondson's Detention of Mr. Parker**

47. After Mr. Parker and Ms. Schmick obtained their marriage license, Mr. Parker contacted Magisterial District 09-1-02 to find out whether he and Ms. Schmick could have their marriage ceremony performed there and whether his consular identification would be accepted for that purpose.

48. Mr. Parker was told that as long as the photo on the consular identification accurately depicted him and the identification had not expired, the Magisterial District Judge—that is, defendant Beckley—could perform the wedding ceremony.

49. Because his consular identification met these standards, Mr. Parker made an appointment for defendant Beckley to conduct the marriage ceremony on May 23, 2017.

50. Mr. Parker and Ms. Schmick were thrilled about their upcoming wedding ceremony. They anxiously awaited formalizing their marriage, in part because they believed that they might be expecting their first child together. Days after their May 23, 2017, appointment, they confirmed Ms. Schmick's pregnancy.

51. To celebrate the occasion, Mr. Parker and Ms. Schmick invited two family members who lived in New Jersey to make the trip to Camp Hill for the marriage ceremony.

52. On the morning of May 23, 2017, Mr. Parker, Ms. Schmick, and their two family members went to Magisterial District 09-1-02.

53. Mr. Parker and Ms. Schmick went to a check-in counter and presented to an employee their marriage license and photo identification. They also paid a fee for the ceremony.

54. Ms. Schmick, who is Caucasian, had her photo identification returned to her immediately.

55. The employee who took their information held on to Mr. Parker's consular identification card and instructed Mr. Parker and Ms. Schmick to remain in the waiting area.

56. Approximately fifteen minutes later, defendant Edmondson, who was armed and in uniform, approached Mr. Parker and told him he had to stay there and was not free to leave.

57. Defendant Edmondson told Mr. Parker that defendant Beckley questioned whether Mr. Parker was lawfully present in the United States and that she wanted to investigate Mr. Parker's immigration status.

58. Defendant Edmondson told Mr. Parker, further, that if defendant Beckley confirmed that Mr. Parker was not in the United States lawfully, Mr. Parker would be arrested by immigration authorities, detained by them, and possibly deported.

59. Despite knowing that he was lawfully present in the United States, Mr. Parker was terrified.

60. Shortly thereafter, defendant Beckley entered the waiting area, dressed in a black judicial robe.

61. Defendant Beckley repeated what defendant Edmondson had told Mr. Parker: that she questioned whether Mr. Parker was lawfully present in the country.

62. Mr. Parker protested that he was, in fact, lawfully present in the United States.

63. Mr. Parker told defendant Beckley that his CYS caseworker had documents confirming his legal status.

64. Ms. Schmick also told defendant Beckley that she and Mr. Parker had documents in their home concerning Mr. Parker's lawful presence in the United States.

65. Defendant Beckley told Ms. Schmick that she was free to leave to obtain whatever documents she wanted.

66. But, defendant Beckley said, Mr. Parker was not free to go with Ms. Schmick. She instructed that he was required to stay in her office.

67. Ms. Schmick rushed home to look for documentation of Mr. Parker's status.

68. Defendant Beckley informed Mr. Parker that she had contacted officers from U.S. Immigration and Customs Enforcement ("ICE").

69. Mr. Parker remained in the waiting area at defendant Beckley's office under defendant Edmondson's watch. Defendant Edmondson told Mr. Parker he was not free to leave.

70. While remaining in the waiting area and panicking that he would be taken to jail, Mr. Parker called his CYS caseworker and told her that he urgently needed proof of his lawful immigration status.

71. The caseworker compiled all of the materials she had proving that Mr. Parker was a Lawful Permanent Resident and transmitted those materials to defendant Beckley's office.

72. Defendant Beckley came back into the waiting area and told Mr. Parker that the documents were not good enough to confirm Mr. Parker's lawful status.

73. Defendant Beckley told Mr. Parker that he would have to remain in the office until the ICE officers arrived.

74. Mr. Parker remained detained in defendant Beckley's office while waiting for the ICE officers to arrive.

75. Upon their arrival, the officers spoke to defendant Beckley and then escorted Mr. Parker into a closed room near the waiting area.

76. The officers asked Mr. Parker about his immigration history, and, as they did so, one of the officers grabbed Mr. Parker's finger and ran a fingerprint scanning device over it.

77. Mr. Parker saw what he believed was an electronic notification appear on the scanner's screen.

78. After reviewing the screen, the officers told Mr. Parker that they confirmed he was a Lawful Permanent Resident and that he had submitted an application for a green card.

79. The officers told Mr. Parker there was no basis for them to detain him and that he was free to go.

80. By this time, Ms. Schmick had returned to Beckley's office.

81. Defendant Beckley told Mr. Parker and Ms. Schmick that she was sorry Mr. Parker had been detained, but she immediately insisted she was justified in suspecting that Mr. Parker was not lawfully present in the United States.

82. She also claimed that Mr. Parker's consular identification card was not an appropriate form of identification.

83. This assertion was false. A consular identification card is widely understood as a valid form of photo identification.

84. In any event, questions about the validity of a consular identification can only properly be resolved by the relevant consulate.

85. Defendant Beckley made no effort to contact the Guatemalan consulate to verify Mr. Parker's consular identification.

86. Instead, based on Mr. Parker's race and national origin, defendant Beckley jumped to the conclusion that Mr. Parker was likely to be unlawfully present and subject to removal from the United States, refused to marry him, detained him, and contacted ICE in an effort to investigate his immigration status and subject him to detention and removal proceedings.

87. Defendant Beckley's stated doubt over Mr. Parker's immigration status provided no basis to detain Mr. Parker. State and local officials have no legal authority to detain persons unilaterally on the basis of suspected civil immigration violations.

88. After defendant Beckley offered her qualified apology for Mr. Parker's detention and her initial refusal to perform the marriage, she said that she could now conduct the marriage ceremony for Mr. Parker and Ms. Schmick.

89. Defendant Beckley's apology was cold comfort to Mr. Parker and Ms. Schmick. Mr. Parker felt disrespected and diminished and was offended and disturbed that defendant Beckley thought he was subject to deportation because he is Latino, dark-skinned, and was born in Guatemala.

90. Throughout the time he was detained, he thought he would be torn away from Ms. Schmick and lose his chance to father a child with her.

91. Despite those concerns, he and Ms. Schmick had already paid a fee for the wedding ceremony, and their family members had made the long trip to join them for the ceremony.

92. For those reasons, Mr. Parker and Ms. Schmick decided to hold their marriage ceremony with defendant Beckley officiating.

93. In light of defendant Beckley's treatment of Mr. Parker, the wedding was nothing like the special occasion Mr. Parker and Ms. Schmick planned.

94. As a direct and proximate result of defendant Beckley's and defendant Edmondson's actions, Mr. Parker suffered substantial emotional pain and suffering which, in light of the circumstances, is likely to be permanent.

95. Defendant Beckley's treatment of Mr. Parker and Ms. Schmick received substantial attention in local and national media.

96. Media reports concerning Mr. Parker and Ms. Schmick also noted that defendant Beckley had, on a prior occasion, contacted immigration officers about



another couple seeking to get married. According to those reports, the groom, a Tajik national, and his best man were arrested by immigration officers.

97. Despite the attention to defendant Beckley's conduct and the clearly wrongful nature of Beckley's actions, the Ninth Judicial District took no action to remedy Beckley's misconduct.

**D. The Violation of Mr. Parker's Constitutional  
and Federally Protected Rights**

98. The actions of defendants Beckley and Edmondson in informing Mr. Parker that he was not free to leave Beckley's office resulted in Mr. Parker's detention.

99. Defendants Beckley and Edmondson had no legitimate reason to believe that there was legal cause to support the detention.

100. Mr. Parker had not violated any federal, state, or local law, and neither defendant knew of any evidence to support any belief that he had done so.

101. The actions of defendants Beckley and Edmondson were based on Mr. Parker's dark complexion, his being Latino, and/or the fact that he was born in Guatemala.

102. Based on those facts, defendants Beckley and Edmondson decided to detain Mr. Parker for the purpose of unilateral, civil immigration investigation and enforcement—before calling ICE.

103. Defendants Beckley and Edmondson did not change their course of action even after Mr. Parker informed them that he had lawful status and his CYS caseworker supplied documentation regarding his status.

104. Mr. Parker's use of a consular identification card did not establish reasonable suspicion or probable cause of his being subject to removal from the United States.

105. Defendant Beckley, defendant Edmondson, and ICE knew of no other facts that indicated that Mr. Parker was subject to removal from the United States.

106. Furthermore, Mr. Parker had a fundamental right under the U.S. Constitution to marry. This well-established right extends to both citizens and non-citizens, regardless of immigration status.

107. Defendant Beckley deprived Mr. Parker of this fundamental right when she refused to conduct a marriage ceremony based on her unwarranted doubt that Mr. Parker was not lawfully present in the United States.

108. Defendant Edmondson aided and abetted that deprivation by detaining Mr. Parker until ICE confirmed his lawful status.

109. Defendant Beckley's and defendant Edmondson's actions were based on Mr. Parker's dark complexion, his being Latino, and/or the fact that he had been born in Guatemala.

110. On the basis of Mr. Parker's race and/or national origin, defendant Beckley detained Mr. Parker and refused to conduct his marriage ceremony. As a result, Mr. Parker was discriminatorily denied the benefits of a program or activity of an entity—the Ninth Judicial District and/or Magisterial District 09-1-02—that is a recipient of federal financial assistance.

111. Based on Mr. Parker's race and/or national origin, defendant Edmondson detained Mr. Parker and aided and abetted defendant Beckley's refusal to perform Mr. Parker's marriage ceremony. Consequently, Mr. Parker was discriminatorily denied the benefits of a program or activity of an entity—the Ninth Judicial District and/or Magisterial District 09-1-02—that is a recipient of federal financial assistance.

112. At all relevant times, as a magisterial district judge working within the Ninth Judicial District, defendant Beckley was an appropriate person to address and remedy discriminatory conduct occurring within the Ninth Judicial District.

113. At all relevant times, as a magisterial district judge working within Magisterial District 09-1-02, defendant Beckley was an appropriate person to address and remedy discriminatory conduct occurring within Magisterial District 09-1-02.

114. As of May 2017, defendant Beckley was aware of the responsibility of the Ninth Judicial District and Magisterial District 09-1-02 not to discriminate on

the basis of race or national origin against persons seeking services from those entities. She was further aware that such responsibility applied both to personnel of those entities and to non-personnel “related staff,” like constables, providing services to those entities.

115. In refusing to perform a marriage ceremony for Mr. Parker and detaining Mr. Parker based on his race and/or national origin, defendant Beckley was deliberately indifferent to the discriminatory nature of her actions.

116. By condoning defendant Edmondson’s detention of Mr. Parker based on Mr. Parker’s race and/or national origin, Defendant Beckley was deliberately indifferent to the discriminatory nature of defendant Edmondson’s actions.

117. At all relevant times, as exemplified by the facts outlined above, the conduct of defendants Beckley and Edmondson was in willful, reckless, and callous disregard of Mr. Parker’s rights under federal law.

## **V. CLAIMS FOR RELIEF**

### **COUNT I**

#### **Plaintiff v. Defendants Beckley and Edmondson Unlawful Detention – Fourth and Fourteenth Amendments**

118. Defendants Beckley and Edmondson detained Mr. Parker without any evidence from which they could reasonably believe they had legal cause to do so, in violation of Mr. Parker’s right to be free from unreasonable searches and seizures

under the Fourth Amendment, and, as such, defendants Beckley and Edmondson are liable to Mr. Parker for damages under 42 U.S.C. § 1983.

119. Defendants Beckley and Edmondson detained Mr. Parker on the basis of his race and/or national origin in violation of Mr. Parker's right to equal protection of the law under the Fourth and Fourteenth Amendments, and, as such, defendants Beckley and Edmondson are liable to Mr. Parker for damages under 42 U.S.C. § 1983.

**COUNT II**  
**Plaintiff v. Defendants Beckley and Edmondson**  
**Violation of the Right to Marry – Fourteenth Amendment**

120. Defendants Beckley and Edmondson deprived Mr. Parker of his fundamental right to marry based on his race and/or national origin in violation of Mr. Parker's rights to due process of law and equal protection of the law under the Fourteenth Amendment, and, as such, defendants Beckley and Edmondson are liable to Mr. Parker for damages under 42 U.S.C. § 1983.

**COUNT III**  
**Plaintiff v. Defendants Ninth Judicial District and Magisterial District 09-1-02**  
**Race and National Origin Discrimination – Title VI**

121. Based on Mr. Parker's race and/or national origin, defendant Beckley refused to perform Mr. Parker's marriage ceremony and instead detained him. As a result, Mr. Parker was discriminatorily deprived of benefits provided by defendants Ninth Judicial District and/or Magisterial District 09-1-02, entities that are recipients

of federal financial assistance. Because Defendant Beckley was an appropriate person to address or remedy discriminatory conduct, defendants Ninth Judicial District and Magisterial District 09-102 are liable to Mr. Parker for damages under Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d.

122. Based on Mr. Parker's race and/or national origin, defendant Edmondson both detained Mr. Parker and aided and abetted defendant Beckley's refusal to perform Mr. Parker's marriage ceremony. As a result, Mr. Parker was discriminatorily deprived of benefits provided by the Ninth Judicial District and/or Magisterial District 09-1-02, entities that are recipients of federal financial assistance. Defendant Beckley was aware of defendant Edmondson's discriminatory conduct and was an appropriate person to address or remedy it. Instead, she was deliberately indifferent to it. Consequently, defendants Ninth Judicial District and Magisterial District 09-1-02 are liable to Mr. Parker for damages under Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d.

## **VI. REQUESTED RELIEF**

**Wherefore**, plaintiff Alexander Parker respectfully requests:

- A. Compensatory damages as to all defendants;
- B. Punitive damages as to defendants Beckley and Edmondson;
- C. Reasonable attorneys' fees and costs;
- D. Such other and further relief as may appear just and appropriate.

Plaintiff hereby demands a jury trial.

/s/ Jonathan H. Feinberg  
Jonathan H. Feinberg  
KAIRYS, RUDOVSKY, MESSING,  
FEINBERG & LIN LLP  
The Cast Iron Building  
718 Arch Street, Suite 501 South  
Philadelphia, PA 19106  
215-925-4400  
jfeinberg@krlawphila.com

/s/ Seth F. Kreimer  
Seth F. Kreimer  
3501 Sansom Street  
Philadelphia, PA 19104  
(215) 898-7447  
skreimer@law.upenn.edu

*Counsel for Plaintiff*  
\* Admitted *pro hac vice*

/s/ Golnaz Fakhimi  
Golnaz Fakhimi\*  
GFakhimi@aclupa.org

/s/ Vanessa Stine  
Vanessa Stine  
VStine@aclupa.org

/s/ Molly Tack-Hooper  
Molly Tack-Hooper  
MTack-Hooper@aclupa.org

AMERICAN CIVIL LIBERTIES UNION  
OF PENNSYLVANIA  
P.O. Box 60173  
Philadelphia, PA 19102  
(215) 592-1513

**CERTIFICATE OF SERVICE**

I hereby certify that on April 8, 2019, I served the foregoing Amended Complaint via CM/ECF on counsel for: defendant Beckley in her individual capacity, defendant Beckley in her official capacity, defendant Magisterial District 09-1-02, and defendant Ninth Judicial District.

Date: April 8, 2019

/s/ Golnaz Fakhimi  
Golnaz Fakhimi\*  
AMERICAN CIVIL LIBERTIES  
UNION OF PENNSYLVANIA  
P.O. Box 60173  
Philadelphia, PA 19102  
(215) 592-1513  
GFakhimi@aclupa.org

*Counsel for Plaintiff*  
\* Admitted *pro hac vice*