

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

---

JA-FATHER DOE 1 and JA-MOTHER  
DOE 1, individually and as parents and  
natural guardians of JA-MINOR DOE 1,  
a minor child,

Case No.: \_\_\_\_\_

Plaintiffs,

**COMPLAINT**

v.

ANTON JOSEPH LAZZARO,

Defendant.

---

Plaintiffs, for their cause of action against Defendant, allege that:

**INTRODUCTION**

1. This is a case arising out of the sex trafficking of a 16-year-old minor by a politically-connected and wealthy adult, Anton “Tony” Lazzaro. As discussed below, Lazzaro used his power, wealth, influence, connections, and resources to recruit children as part of a predatory enterprise of perversion wherein he used whatever means he could to gain their trust so that he could prey on them. When it became clear that Lazzaro had committed serious crimes, he attempted to coerce his victims and their families into keeping silent. The impact of Lazzaro’s predation has caused significant harm to Plaintiffs’ family, as discussed below.

**PARTIES**

2. Plaintiff JA-Minor Doe 1 (hereinafter “Minor Doe”) is a pseudonym protecting the identity of a minor child residing in the State of Minnesota. The identity of the Plaintiff will be disclosed under separate cover to Defendant Lazzaro.

3. Plaintiff JA-Father Doe 1 (hereinafter “Father Doe”) is a pseudonym protecting the identity of Minor Doe. Plaintiff Father Doe is an adult resident of the State of Minnesota and is the parent and natural guardian of Plaintiff Minor Doe.

4. Plaintiff JA-Mother Doe 1 (hereinafter “Mother Doe”) is a pseudonym protecting the identity of Minor Doe. Plaintiff Mother Doe is an adult resident of the State of Minnesota and is the parent and natural guardian of Plaintiff Minor Doe.

5. At all times material, Defendant Anton Joseph Lazzaro (“Lazzaro”) was an adult resident of the State of Minnesota, residing at 201 11<sup>th</sup> Street South, #1920, Minneapolis, Minnesota 55402.

### **JURISDICTION**

6. This Court has federal subject matter jurisdiction pursuant to 28 U.S.C. § 1331 and 18 U.S.C. § 1595 because it arises out of violations of the Trafficking Victims Protection Reauthorization Act (18 U.S.C. §§ 1589 *et seq.*).

7. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(a) because a substantial part of the events and omissions giving rise to the claims occurred in this District.

### **FACTS**

8. Defendant Lazzaro is an adult male residing in Minneapolis. He is a self-described entrepreneur, with involvement in dozens of businesses across the country. Lazzaro has several powerful political connections that he has leveraged and is the founder of a political action committee.

9. Lazzaro was closely and publicly aligned with prominent political figures, including a former chairperson of a major political party in Minnesota.

10. Lazzaro often flaunted his wealth and high-powered political connections to the public and on social media. For example, Lazzaro posted pictures of himself carrying tens of thousands of dollars in cash, sitting atop a private jet, and driving in his Ferrari. Lazzaro's image could be found online next to several noteworthy politicians, political figures, and prominent members of the media. Upon information and belief, Lazzaro actively displayed his wealth and political connections as a means to intimidate and coerce others.

11. Upon information and belief, Gisela Castro Medina ("Medina") met Lazzaro through a website called "Seeking Arrangement," also known as "Seeking," a website described as a dating platform for "sugar dating," wherein a "sugar daddy" and "sugar baby" enter into a relationship "that offers financial support in exchange for companionship and possibly sex."<sup>1</sup>

12. At some point in time in 2020, Lazzaro engaged Medina in an enterprise wherein Lazzaro would become a sexual ringmaster and Medina would find him young women and children under the age of 18 for sex in exchange for money and gifts.

13. Upon information and belief, Medina targeted girls and women that she knew or that she discovered on social media and introduced them to Lazzaro in exchange for money and gifts.

14. Minor Doe was one of the minor children that Medina and Lazzaro targeted for sex trafficking as a part of their enterprise.

#### **Grooming of Minor Doe by Lazzaro and Medina**

15. In approximately 2018, when Plaintiff Minor Doe was approximately 14 years of age, she became acquainted with Medina, who at the time was approximately 16 years of age. The two established a social friendship. Plaintiff Minor Doe trusted Medina because of this friendship.

---

<sup>1</sup> <https://www.nytimes.com/2018/10/15/style/sugar-dating-seeking-arrangement.html> (accessed September 3, 2021)

16. In approximately May of 2020, Plaintiff Minor Doe was 16 years of age. At about this time, Medina recruited Minor Doe to meet Lazzaro.

17. In approximately late May of 2020, Medina began grooming Minor Doe to be trafficked by introducing her to Lazzaro and establishing him as a powerful, prominent and wealthy businessman and political figure.

18. Medina introduced Lazzaro to Minor Doe in person, using Minor Doe's established trust with Medina to create trust with Lazzaro, who was seeking to sexually exploit the Minor Doe for himself.

19. From approximately May to July, 2020, Lazzaro arranged for cars to bring Minor Doe to his home on several occasions.

20. From approximately May to July, 2020, where Lazzaro committed multiple commercial sex acts against the Minor Doe, in violation of 18 U.S.C. §§ 1591(a)(1) and 1594(a), including but not limited to recruiting, enticing, harboring, transporting, providing, obtaining, maintaining, and soliciting commercial sex acts with a minor child below the age of 18 years of age.

#### **Coercion via Non-Disclosure Agreement**

21. After months of repeated sex trafficking of the Minor Doe by Lazzaro, Lazzaro attempted to coerce Plaintiffs' silence through Lazzaro's attorneys and to cover-up his illegal activity with a non-disclosure agreement.

22. On approximately July 29, 2020, Plaintiff Father Doe received a phone call from attorney Daniel Adkins of North Star Criminal Defense in St. Paul, Minnesota, on behalf of Lazzaro and Medina and offering Plaintiffs hush money and a non-disclosure agreement – a gag

order – to require them to keep silent about Lazzaro’s sex trafficking activities so Lazzaro could continue the sex trafficking enterprise.

23. Attorney Adkins suggested that Minor Doe was “aggressively seek[ing] to defame our clients” on social media, referencing both Lazzaro and Medina. The proposed agreement sent to Father Doe by Attorney James Gempeler of North Star Criminal Defense threatened Father Doe and Minor Doe with alleged claims for “disparaging social media posts, whether all are true or not” and “a potential damage to property claim.”

24. The proposed agreement admits “Mr. Lazzaro and [Minor Doe] had a consensual interaction in the recent past.”

25. The proposed agreement offers a payment of \$1,000 in exchange for Plaintiffs agreeing not to publicly disparage Lazzaro or Medina. It demands that Plaintiffs “not disclose the nature of the prior interaction with Mr. Lazzaro to the public” with the intention of continuing the criminal sex trafficking enterprise.

26. Plaintiff Father Doe declined to enter into the proposed agreement and instead reported Lazzaro to law enforcement.

### **Damages**

27. As a direct result of the sexual abuse, Plaintiff Minor Doe has suffered and will continue to suffer great pain of mind and body, severe and permanent emotional distress, embarrassment, loss of self-esteem, humiliation and psychological injuries, sexual confusion, depression, was prevented and will continue to be prevented from performing her normal daily activities and obtaining the full enjoyment of life, has incurred and will continue to incur expenses for medical and psychological treatment, therapy and counseling.

28. As a direct and proximate result of the sexual abuse and trafficking of their daughter

by Lazzaro, Plaintiffs Father Doe and Mother Doe have suffered loss of consortium damages relating to the above-described injuries to their daughter, Minor Doe.

29. Plaintiffs Father Doe and Mother Doe are reasonably certain to suffer further loss of consortium damages in the future as a direct and proximate result of the above-described sexual abuse and trafficking of Minor Doe, and the obstruction that followed by Lazzaro.

30. As a direct and proximate result of the sexual abuse and trafficking of their daughter by Lazzaro, Plaintiffs Father Doe and Mother Doe have incurred medical, economic, and other special damages and are reasonably certain to suffer further expenses and special damages in the future.

31. Plaintiffs have incurred and will continue to incur attorney fees as a result of this civil action.

#### **COUNT I: SEX TRAFFICKING OF A MINOR**

32. Plaintiffs incorporate all paragraphs of this Complaint as if fully set forth under this count and further allege:

33. From approximately May of 2020 to July of 2020, Lazzaro committed multiple acts in violation of 18 U.S.C. §§ 1591(a)(1) and 1594(a), including but not limited to recruiting, enticing, harboring, transporting, providing, obtaining, maintaining, and soliciting commercial sex acts with a minor child, Minor Doe, who was below the age of 18 years of age.

34. As part of the sex trafficking of Minor Doe, Lazzaro relied on the perception he had created that he was a powerful and well-connected man to coerce Minor Doe.

35. As part of the sex trafficking of Minor Doe, Lazzaro relied on the participation of Medina, an adult in whom Minor Doe had a great deal of trust, in order to coerce Minor Doe.

36. Plaintiffs suffered the damages described above from Lazzaro's violations of 18 U.S.C. §§ 1591(a)(1) and 1594(a).

37. Plaintiffs are entitled to recover their damages and reasonable attorney fees from Lazzaro pursuant to 18 U.S.C. § 1595.

## **COUNT II: OBSTRUCTION**

38. Plaintiffs incorporate all paragraphs of this Complaint as if fully set forth under this count and further allege:

39. Lazzaro contacted Minor Doe and her parents through his attorneys and tried to cover up what he had done to Minor Doe and attempted to silence Plaintiffs with a hush money payment so that he could continue the criminal enterprise.

40. As part of the attempted negotiation to enter into the nondisclosure agreement, Lazzaro, through his attorneys, threatened Minor Doe and her family with specious legal actions, including defamation for admittedly true statements. Lazzaro attempted to coerce Minor Doe and her family into silence, which would allow Lazzaro to continue his criminal enterprise and avoid exposure of his criminal enterprise.

41. Lazzaro's effort to silence Plaintiffs through his attorneys was an overt obstruction of the enforcement of the federal sex trafficking laws that he had violated, including but not limited to 18 U.S.C. § 1591(a), which is itself a violation of 18 U.S.C. § 1591(d).

42. Plaintiffs suffered damages and attorney fees from Lazzaro's obstruction, described above.

43. Lazzaro is responsible for Plaintiffs' damages pursuant to 18 U.S.C. § 1595.

**COUNT III: CONSPIRACY**

44. Plaintiffs incorporate all paragraphs of this Complaint as if fully set forth under this count and further allege:

45. Defendant Lazzaro had an agreement with others to accomplish human trafficking through unlawful means.

46. As ringleader of the sex trafficking enterprise, Lazzaro relied on the participation of Medina, an adult whom Minor Doe had a great deal of trust, as a recruiter in order to coerce Minor Doe.

47. Defendant Lazzaro agreed to a criminal sex trafficking enterprise of minor children, including Minor Doe, through the use of coercion and threats to their physical and social well-being. Every act of sexual exploitation was an overt act in furtherance of the conspiracy. Financial benefits conferred upon members of the conspiracy in return for their proffering of children for sexual exploitation are additional overt acts in furtherance of the conspiracy.

48. Defendant Lazzaro agreed and conspired to maintain secrecy regarding the sexual exploitation of Minor Doe in order to protect himself and others financially and politically. The failure of any member of the conspiracy to report Minor Doe's abuse constitutes an ongoing overt act of the conspiracy on the part of Lazzaro and the other members of the conspiracy.

49. Lazzaro's participation in the conspiracy to traffic Minor Doe and his participation in the conspiracy to silence Minor Doe and her family are in violation of 18 U.S.C. §§ 1591(a) and 1591(d), among other federal statutes. Plaintiffs are entitled to bring this civil claim for damages pursuant to 18 U.S.C. § 1595.

50. Plaintiffs suffered damages and attorney fees directly from the conspiracy described above.



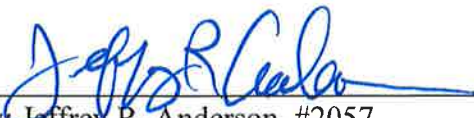
WHEREFORE, Plaintiffs demand judgment against Defendant in an amount to be proven at trial plus costs, disbursements, reasonable attorney fees, interest, and whatever other relief the Court deems just and equitable.

DEMAND IS HEREBY MADE FOR A TRIAL BY JURY.

Respectfully submitted,

Dated: September 7, 2021.

JEFF ANDERSON & ASSOCIATES, P.A.

  
By: Jeffrey R. Anderson, #2057  
Patrick Stoneking, #0348569  
Stacey J. Benson, #0399718  
Attorneys for Plaintiffs  
366 Jackson Street, Suite 100  
St. Paul, MN 55101  
(651) 227-9990

#### ACKNOWLEDGMENT

The undersigned hereby acknowledges that sanctions, including costs, disbursements, and reasonable attorney fees, may be awarded pursuant to Minnesota Statute Section 549.211 to the party against whom the allegations in this pleading are asserted.



JS 44 (Rev. 04/21)

**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**

JA-Father Doe 1 & JA-Mother Doe 1, individually & as parents & natural guardians of JA-Minor Doe 1, a minor child

(b) County of Residence of First Listed Plaintiff

(EXCEPT IN U.S. PLAINTIFF CASES)

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

Jeff Anderson & Associates, PA  
366 Jackson Street, Suite 100  
St. Paul, MN 55101

**DEFENDANTS**

Anton Joseph Lazzaro

County of Residence of First Listed Defendant Hennepin

(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 ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 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)

- |   | PTF                                   | DEF                                   |   | PTF                        | DEF                        |
|---|---------------------------------------|---------------------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input checked="" type="checkbox"/> 1 | <input checked="" type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2            | <input type="checkbox"/> 2            | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3            | <input type="checkbox"/> 3            | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input checked="" type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>INTELLECTUAL PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

**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 (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
18 USC sections 1591, 1595

Brief description of cause:  
Sex trafficking of a minor

**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

09/07/2021

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 there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. **Origin.** Place an "X" in one of the seven 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.
- 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 – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
- Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
- PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7.** Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- 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.