

**FILED**  
U. S. DISTRICT COURT  
EASTERN DISTRICT ARKANSAS

SEP 04 2020

JAMES W. McDOERMACK, CLERK  
By: JS  
DEP CLERK

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS  
LITTLE ROCK DIVISION  
Central**

**ELIZABETH ANN CORBITT, on behalf of herself  
And all other similarly situated**

**PLAINTIFF**

**V. CASE NO. 4:20-cv-1070-JM**

**BOARD OF TRUSTEES OF THE  
UNIVERSITY OF ARKANSAS SYSTEM; and  
JOHN GOODSON, Esq., Chairman, in his official capacity  
As Trustee, and  
TED DICKEY, Esq., in his official capacity as Trustee  
CC. "Cliff" Gibson, III, Esq., in his official capacity as Trustee  
Morril Harriman, Esq., in his official capacity as Trustee  
Kelly Eicher, Esq. in her official capacity as Trustee  
Sheffield Nelson, Esq. in his office capacity as Trustee**

**DEFENDANTS**

**CLASS ACTION COMPLAINT FOR DECLARATORY JUDGMENT  
INJUNCTIVE RELIEF AND OTHER EQUITABLE MONETARY RELIEF  
TO REMEDY THE PRESENT DEPRIVATIONS OF  
CONSTITUTIONAL RIGHTS AND INJUSTICE  
PRESENT IN THE UNIVERSITY OF ARKANSAS AT FAYETTEVILLE  
PARKING TICKET REGIME**

Plaintiffs, Elizabeth A. Corbitt, by counsel, brings this action on behalf of herself, individually, and as a Class Action on behalf of a proposed Class of similarly-situated persons (collectively hereinafter referred to as "Plaintiffs"), defined below against defendants, Board of Trustees for the University of Arkansas System ("University"), and John Goodson, Chairman, in his official capacity as Trustee, for her complaint, states:

**OVERVIEW AND FACTS**

1. Elizabeth A. Corbitt as of Fall of 2019 was a freshman student at the University of Arkansas at Fayetteville, AR.

**This case assigned to District Judge Moody  
Page 1 of 20 and to Magistrate Judge Volpe**

2. On or about August 9, 2019, Plaintiff Elizabeth A. Corbitt, (“Plaintiff”) purchased a parking permit for \$104.79 from the University of Arkansas Transit Department. See Exhibit “A”.
3. On or about August 27, 2019, Elizabeth parked in student parking lot 56 D and was issued a warning ticket. See Exhibit “A1”
4. On or about September 13, 2019 was offered an upgraded parking permit for Zone 3 Resident parking permit for Lot 50. See Exhibit “B”.
5. On or about September 13, 2019 and she accepted and paid \$641.85 for the upgraded permit. See Exhibit “B”.
6. On or about Friday, September 13, 2019 at around 2:43 pm, that parking permit was issued and valid. See Exhibit “C”.
7. On Friday, September 13, at 2:56 p.m., U of A Transit system sent out an email to the entire reserved student parking permit holders receive an email notifying her that all vehicles parked in Razorback Foundation Priority Parking lots must be moved by 11:59 p.m. September 13, 2019. See Exhibit “H”
8. On Saturday, September 14 after 5 p.m. Elizabeth parked her car in lot 29E – Reserved Parking. See Exhibit “D” – the parking map. <http://parking.uark.edu>
9. On Saturday, September 14, the same day, Elizabeth was issued a ticket and her car was towed to from Lot 29E Lot 55. See Exhibit “E”.
10. On Sunday, September 15, 2019, Elizabeth was fined \$100 and that ticket amount was placed on Elizabeth’s student account. See Exhibit “F”.
11. The University made no attempt to comply with the Arkansas Constitution.
12. The notice did not properly inform Elizabeth Corbitt before towing her car.

13. The Arkansas Constitution forbid the taking of a person's property without notice and a meaningful opportunity for hearing. *Franklin v. State*, 267 Ark. 311, 316, 590 S.W.2d, 31 (1979).
14. All administrative remedies have been exhausted because Elizabeth Corbitt was required to pay the ticket in full prior a hearing. See Exhibit "J".
15. All administrative remedies have been exhausted because Elizabeth Corbitt was required to fill out a form explaining why she was innocent of the parking violation. See Exhibit "G" and Exhibit "H" and Exhibit "J".
16. All administrative remedies have been exhausted because Elizabeth Corbitt was denied a hearing. See Exhibit "G" and Exhibit "H" and Exhibit "J".
17. All administrative remedies have been exhausted because Elizabeth Corbitt was denied adequate notice and a hearing. See Exhibit "G" and Exhibit "H".
18. All administrative remedies have been exhausted because 5 days is too short of a time frame for adequate notice to appeal. See Exhibit "G" and Exhibit "H".
19. All administrative remedies have been exhausted because Elizabeth Corbitt was required to violate her 5<sup>th</sup> Amendment of the U.S. Constitution rights against self-incrimination prior to a hearing.
20. The U.S. Constitution under the 7<sup>th</sup> Amendment guarantees the right of a trial by jury for all amounts over twenty (\$20.00) dollars. Plaintiff was denied that right.
21. The Arkansas Supreme Court has held that a "statute authorizing a temporary or permanent injunction without notice and an opportunity to be heard fails to meet the fundamental requirements of due process clause of the Fifth and Fourteenth Amendments

to the Constitution of the United States and Article 2, section 21 of the Arkansas Constitution. *Franklin v. State*, 267 Ark. 311, 316, 590 S.W.2d, 31 (1979).

22. This court should restrain the University of Arkansas from taking any further action in violation of the Arkansas Constitution.
23. The University's actions have caused irreparable harm to the students at the University of Arkansas.
24. The University of Arkansas Parking Ticket Regime illegally and unlawfully prohibits students from registering for next semester's classes until all tickets are paid by placing a hold on their student account.
25. The University's actions of issuing tickets, towing vehicles and requiring a profession of innocence without notice or an opportunity to be heard is an abuse of power.
26. The Board through its parking and transit committee issues over 40,000 tickets a year. See Exhibit "I".
27. The University has created a quota of tickets that have to be issued in order to meet budgetary and monetary demands.
28. The Board through its parking and transit committee had collected in excess of \$1,000,000 in fines in traffic fines for each the years 2016, 2017, 2018, 2019.
29. The Board through its parking and transit committee is projected to collect in excess of \$1,200,000 in fines in traffic fines for the year 2020.
30. The Board is collecting an extraordinary amount money per year of the backs of struggling students through its unconstitutional practices of collecting fines prior to trial, preventing registration of classes because of unpaid fines, improperly limiting the amount of time to file an appeal or plead not guilty, and finally improperly limiting access to a

hearing by demanding a valid reason for a hearing, all in violation of the due process rights afforded by the U.S. Constitution and Arkansas Constitution.

**PARTIES, JURISDICTION, AND VENUE**

31. Plaintiff Elizabeth Ann Corbitt (“Plaintiffs”) is a citizen of Arkansas and a resident of Washington County while attending college at the University of Arkansas.
32. Defendant, the Board of Trustees of the University of Arkansas System (“Board and/or University”) is a land-grant state university offering educational opportunities.
33. Defendant, the Board is the governing body of the University of Arkansas System.
34. The Board through the trustees as named in this suit are all licensed attorneys and as such, they have a duty to defend the constitution.
35. The U.S. Constitution and Arkansas Constitution is being violated by the University.
36. Pursuant to Ark. Code Ann. §6-64-202, the Board is made a political and corporate body whose powers are restricted by the United State Constitution, Constitution of the State of Arkansas, and the laws of the State of Arkansas.
37. The Board specifically manages and controls all related policies for the University of Arkansas System.
38. The class is represented by the Elizabeth A. Corbitt, a student at the University of Arkansas at Fayetteville.
39. Plaintiffs seek entry of a declaratory judgment pursuant to 28 U.S.C. §§ 2201 and 2202, declaring the rights, power, and other legal relations between the parties as it concerns the issuance of parking tickets and the collections of fines.
40. Plaintiffs, in addition to the declaration of rights pursuant to 28 U.S.C. §§ 2201 and 2202, request that the Court enter a permanent injunction pursuant to 42 U.S.C §§ 1983 and

1988, enjoining the University of Arkansas Transit and Parking Department from issuing parking violations and awarding their attorney's fees and expert fees and costs in pursuing this class action.

41. This Court has subject matter jurisdiction over this matter pursuant to 28 U.S.C. §§ 1331, 1343, and 1367.

42. This Court has the authority to grant declaratory relief under 28 U.S.C. §§ 2201 and 2202 and Federal Rules of Civil Procedure Rule 57.

43. This Court has the authority to grant injunctive relief under 42 U.S.C. §§ 1983 and 1988 and Federal Rules of Civil Procedure Rule 65

44. Venue is proper in this Court pursuant to 28 U.S.C §1391.

45. The claims of Plaintiff are brought pursuant to the Arkansas State Constitution; the Arkansas Civil Rights Act of 1993, Ark. Code Ann. § 16-123-101, *et seq*; the Arkansas Uniform Declaratory Judgments Act, Ark. Code Ann. § 16-111-101, *et seq* and Ark. R. Civ. P. 57; and Arkansas state law.

46. This Court has subject matter jurisdiction and personal jurisdiction over all Defendants.

47. Venue is proper in this Court.

48. The Board at all times was all acting under color of state law at all relevant times discussed below.

49. The Board has authority in accordance with Ark. Code Ann. §25-17-307 has the authority to establish regulations to facilitate the operation and parking of motor vehicles on the University of Arkansas Campus in Fayetteville, AR.

50. Defendant University is responsible for the actions of its employees through the doctrine of respondeat superior and the non-delegable duty to comply with the Arkansas Constitution.
51. Defendants Board of Trustees through its employees of the University Parking Ticket Regime conspired via email and other communications to deprive the Plaintiff of her due process rights and had notice that the University was doing so unlawfully based on prior actions being ruled illegal.
52. Defendant Board of Trustees has the power to enforce regulations promulgated through the Transit, Parking and Traffic Committee.

**CLASS ACTION REGARDING SIMILARLY SITUATED PERSONS**

53. Pursuant to Ark. R. Civ. P. 23, Representative Plaintiff brings this action on behalf of itself and a Class of individuals defined as follows:
- All person including students and non-students issued a ticket by the University of Arkansas within the last three (3) years.
- Excluded from the Class are: (1) all Defendants; and (2) any judge or justice to whom this action is assigned, together with any relative of such judge or justice within the third degree of relationship, and the spouse of any such person.
54. The University of Arkansas Parking Ticket Regime and requirements of protesting or requesting a hearing are unconstitutional on their face.
55. The University of Arkansas Parking Ticket Regime applies to all people issued tickets on the University Property located in Fayetteville, Arkansas.
56. Upon information and belief, the number of Class members will exceed 1,000. Thus, individual joinder is impractical in satisfaction of Ark. R. Civ. P. 23(a)(1).

57. Representative Plaintiff's claims are typical of the claims of the Class, as required by Ark. R. Civ. P. 23(a)(3), in that Representative Plaintiff was subject a parking ticket and provisions of the Parking Ticket Regime enforced against her during the proposed Class Period.

58. The factual and legal bases of Representative Plaintiff's claims are common to all members of the Class and represents a common cause of injury to Representative Plaintiff and the Class members.

59. Numerous questions of law and fact are common to the Class and predominate over questions affecting only individual Class members, as required by Ark. R. Civ. P. 23(a)(2) and 23(b). Such common questions include, but are not limited to:

- a. Whether the Parking Ticket Regime provides for unlawful admissions of guilt;
- b. Whether the Parking Ticket Regime violates procedural and due process;
- c. Whether the Parking Ticket Regime fails to provide adequate notice of the right to adequate notice and a hearing;
- d. Whether the Parking Ticket Regime provides for excessive fines in violation of the Arkansas State Constitution;
- e. Whether Representative Plaintiff and the Class are entitled to a refund of fines and penalties paid and, if so, in what amount;
- f. Whether Representative Plaintiff and the Class are entitled to compensation for demanding unlawful admissions of guilt, adequate notice and a hearing, and, if so, in what amount;
- g. Whether Representative Plaintiff and the Class are entitled to injunctive relief; and



h. Whether Representative Plaintiff and the Class are entitled to a declaration that the Parking Ticket Regime, and forms used to comprise that regime are unconstitutional and void.

60. Representative Plaintiff's claims are typical of the claims of the Class because they arise from the same course of conduct by Defendants and the relief sought is common.

61. The Class is ascertainable, as the Class is defined using objective criteria and Class Members are easily identifiable based on records in possession of Defendant.

62. Most, if not all, of these documents are subject to the Arkansas Freedom of Information Act.

63. Most, if not all, of these documents are in possession of the University.

64. Representative Plaintiff will fairly and adequately represent and protect the interests of the Class, as required by Ark. R. Civ. P. 23(a)(4). Moreover, Representative Plaintiff has retained counsel with substantial litigation experience. Representative Plaintiff and its counsel are committed to the vigorous prosecution of this action on behalf of the Class and have the financial resources to do so. Neither Representative Plaintiff nor its counsel has any interests adverse to those of the Class.

### **COUNT I**

#### **VIOLATION OF SUBSTANTIVE AND PROCEDURAL DUE PROCESS UNDER THE U.S. CONSTITUTION AND ARKANSAS STATE CONSTITUTION**

65. Representative Plaintiff incorporates by reference all of the foregoing paragraphs as if fully restated herein.

66. Article 2, §§ 2 – 3 and 21 of the Arkansas Constitution ensure due process of law.

67. Plaintiffs are entitled to the fundamental constitutional rights as set forth in the Arkansas Constitution.

**Unconstitutional Conditions**

68. No one acting under color of state law may condition the receipt of a benefit, such as a requirement to fill out a form and explain your innocence or refusal to fill out the same form on agreement to refrain from exercising one's constitutional rights, particularly one's right to due process of law under the 14<sup>th</sup> Amendment of U.S. Constitution.
69. No one acting under color of state law may deny a benefit to a person for exercising their constitutional rights.
70. No one acting under color of state law can impose arbitrary or unreasonable restrictions upon private property or its use.
71. Whether or not the actor under color of state law ultimately succeeds in pressuring someone into forfeiting a constitutional right, the unconstitutional conditions doctrine forbids burdening the Arkansas State Constitution's enumerated rights by coercively withholding benefits from those who exercise them.
72. The right to own property in Arkansas, like the right to exclude others from private property, is an extension of one's private property rights.

**Procedural Due Process**

73. Procedural due process requires at a minimum that a person be given notice and a reasonable opportunity for a hearing before he is deprived of property under color of state law.
74. The hearing must be before an impartial decision maker.
75. The University of Arkansas request for a hearing is not impartial.
76. The appeals form states it is a court: See Exhibit "G"

**UAF Traffic Appeals Court  
Parking Violation Appeal Form**

**Please Read Carefully Before Completing**

77. No court in this nation requires you to fill out a form addressing your guilt: *Id.*

**An appeal must address the violation and be based on very extenuating circumstances that caused violation of the parking and traffic regulations, before it will be reviewed by the Appeals Court. A lost ticket, forgetfulness, parking only for a short period, failure to display a parking permit, and/or not seeing the signs are not grounds for an appeal.**

78. Procedural due process also requires that Defendants avoid any appearance of bias or reasonable suspicion of unfairness.

79. If your vehicle is towed, you are required to pay your citation fine before you can appeal:

*Id.*

**2. Once the vehicle has been booted or towed, all tickets must be paid before they can be appealed.**

80. Plaintiffs have rights to privacy, to use and enjoyment of their property, to have and protect their reputation, and to engage in lawful business.

81. These are fundamental rights under the Arkansas Constitution.

82. The Board failed to provide adequate pre-deprivation or post-deprivation procedural safeguards to satisfy due process.

83. The pre-deprivation notice is nonexistent. Traffic citation recipients are forced to pay the fines, pay a \$10 appeal fee and explain why their reason is valid for a hearing in violation of their constitutional rights of due process and adequate notice.

**Substantive Due Process**

84. Substantive due process guarantees that action taken under color of state law is not arbitrary or capricious.

85. The appeals process provided by the University of Arkansas denies parking ticket violators the right to due process. *Id.*

86. Demand for an appeals form and demands for “very extenuating circumstances” are not valid reasons for denying an appeal. *Id.*
87. The Parking Ticket Regime and Appeals procedures of requiring a payment of \$10 and payment of all fines are arbitrary and capricious.
88. The Parking Ticket Regime has employed a scheme that violated Article 2, § 15 of the Arkansas Constitution.
89. The appeals form procedures of the University does not advance a compelling state interest.
90. The appeal procedures of the University are unconstitutional and invalid for failure to provide due process of law as required by the Arkansas Constitution.
91. Defendant was at all times aware of the actions of its employees.
92. Defendants knew or reasonably should have known that their Appeals procedures violated Plaintiffs’ constitutional rights.
93. Defendants’ actions deprived Plaintiffs of their fundamental rights secured by the Arkansas Constitution.
94. Plaintiffs have suffered damages as a result of Defendants’ deprivation of their constitutional rights.
95. Defendants conspired via email and other communication to deprive the Plaintiff of her due process rights.

### **COUNT III**

#### **ABUSE OF PROCESS**

96. Plaintiffs incorporate by reference all of the foregoing paragraphs as if fully restated herein.

97. Defendants have no right to demand that the Plaintiff fill out a form for reasons of appeal.

98. Defendants abused a proper legal procedure of appealing a parking ticket.

99. Plaintiffs have suffered damages from the Defendants abuse of process.

100. Defendants' abuse of process was the proximate cause of the damages sustained by the Plaintiffs.

101. Defendants conspired via email and other communication to deprive the Plaintiff of his due process rights.

#### **COUNT IV**

#### **CIVIL CONSPIRACY**

102. Plaintiffs incorporate by reference all of the foregoing paragraphs as if fully restated herein.

103. Defendants via email to deprive the Plaintiff of his due process rights.

104. Defendants knew or should have reasonably known that their actions against the Plaintiff was unlawful and deprived her of her due process by using an appeal form demanding a statement of innocence depriving the Plaintiff of its rights.

105. Defendants knew or should have reasonably known that their actions against the Plaintiff was unlawful and deprived her of her due process by using switching the burden of proof from innocent until proven guilty to "prove your innocence", thereby depriving the Plaintiff of her rights.

106. Plaintiff has been damaged by the defendants conspiring with the Parking Ticket Employees.

107. Plaintiff has been damaged by the defendants by conspiring with the Parking Ticket employees to set quotas and to interfere with the civil rights of the Plaintiff and other so situated. 42 U.S. Code § 1985

**COUNT V**

**RELIEF UNDER THE UNIFORM DECLARATORY JUDGMENTS ACT AND  
THE US CONSITUTION – DUE PROCESS VIOLATIONS**

108. Plaintiffs incorporate by reference all of the foregoing paragraphs as if fully restated herein.
109. Plaintiff seek entry of a declaratory judgment pursuant to 28 U.S. Code §§2201 and 2202, declaring class's rights, power, and other legal relations with the Board as enforces parking regulations.
110. Plaintiff seeks the entry of an injunction pursuant to 42. U.S.C. §§ 1983 and 1988, enjoining the Board from continuing its parking ticket regime and from applying it to the Class members.
111. This court of record should declare the above actions were unlawful and grant relief to the Plaintiff as requested in its demand for relief under A.C.A. §16-111-101.
112. This court should bar any further actions by issuing a declaration that all violators of parking ordinances on the University of Arkansas Campus are due adequate notice and a proper hearing before finding them guilty of a traffic citation and tying it to their student account and preventing them from registering for class.
113. This court should declare that the actions taken by the University of Arkansas and the individuals named herein have violated the law and damaged the Plaintiff in an amount to be proved at trial.

114. This court should issue a declaratory judgment in addition to the causes of actions listed herein in order to settle and afford relief to the Plaintiff.

115. Plaintiff is entitled to a judgment declaring that the actions committed by the University of Arkansas and the individuals named herein were unconstitutional and unlawful under the Arkansas Constitution and under Ark. Code Ann. §§16-123-101, *et seq.* and 16-111-101, *et seq.*

### **COUNT VI**

#### **LIABILITY UNDER THE ARKANSAS CIVIL RIGHTS ACT AND THE US CODE**

116. Plaintiffs incorporate by reference all of the foregoing paragraphs as if fully restated herein.

117. Pursuant to the Arkansas Civil Rights Act “every person who, under the color of any ... ordinance ... of this state or any of its political subdivision subjects ... any person within its jurisdiction thereof to the deprivations of any rights ... secured by the Arkansas Constitution shall be liable to the party injured in an action in circuit court for legal and equitable relief or other proper redress.” Arkansas Code Ann. §16-123-105(a) and 42 U.S. Code §1983

118. The fifth amendment and the fourteenth amendment of the U.S. Constitution requires that no person be deprived of his life, liberty or property without due process of law.

119. At a minimum, due process requires notice that is “reasonably calculated, under all the circumstances, to apprise interested parties of the pendency of the action and afford them an opportunity to present their objections.

120. Similarly, the Arkansas Constitution, Article 2, Section 21 prohibits the State from depriving any person of life, liberty and property without due process of law.
121. The government is required to provide notice and an opportunity to be heard “at a meaningful time and in a meaningful manner”. *Fuentes v. Shevin*, 407 U.S. 67, 80, 90 (1972).
122. By adopting the Parking Ticket Regime and electing not to create a true court and a board of appeals, the University of Arkansas vested final decision-making authority under its made-up rules and made up Appeals form, thereby violating the Plaintiff’s rights.
123. The actions of the University of Arkansas deprived the Plaintiff a property interest without having due process required under Article 2, section 21 of the Arkansas Constitution.
124. The action of the University has deprived the Plaintiff of her civil rights under 42 U.S. Code § 1983 and 1988

## **COUNT VII**

### **UNLAWFUL TYING AGREEMENT**

125. Representative Plaintiff incorporates by reference all of the foregoing paragraphs as if fully restated herein.
126. Under authority of state law, Defendant University of Arkansas is granted a monopoly to provide parking on its campus.
127. Defendant is not permitted to engage in an illegal tying arrangement.
128. Defendant’s custom of collecting parking tickets fines as a condition of registering for classes is an illegal tying arrangement.



129. For students with an open account for parking fines, Defendant will not let that student register for next semester's classes if all fines are not paid.
130. Illegal tying arrangements are prohibited by the Arkansas Constitution; the Arkansas Unfair Practices Act, Ark. Code Ann. § 4-75-201, *et seq*; and Arkansas common law.
131. The Class members have suffered damages as a result of Defendants' illegal tying arrangement.

**PUNITIVE DAMAGES UNDER THE ARKANSAS CIVIL RIGHTS ACT**

132. The University of Arkansas should have known and/or should have reasonable known that their actions in this case were unlawful because it requires you to state reasons for your innocence in violation of long-standing principals of criminal law.
133. The University of Arkansas should have known and/or should have reasonable known that depriving the Plaintiff of their right to due process and thereby harming the Plaintiff financially by constructively preventing them from registering for classes until all fines are paid has irreparable harmed the Plaintiff.
134. Defendants conspired via email and other communication to deprive the Plaintiff of his due process rights
135. Because the University of Arkansas actions were outside of the law and deprived the Plaintiff of its due process rights and because the University of Arkansas intentionally and should be punished to prevent the University of Arkansas from acting the same way in the future.

**PRAYER FOR RELIEF**

WHEREFORE, Representative Plaintiff respectfully prays for the following relief:

- a. The Court enter judgment declaring the action of the University of Arkansas actions are unconstitutional and invalid pursuant to the Arkansas Constitution; Ark. Code Ann. §§ 16-123-101, *et seq.*; and 16-111-101, *et seq.*;
- b. The Court enter judgment granting permanent injunctive relief against enforcement of the University of Arkansas Parking Ticket Regime pursuant to the Arkansas Constitution; Ark. Code Ann. §§ 16-123-101, *et seq.*; and 16-111-101, *et seq.*;
- c. The Court enter judgment in favor of Plaintiff against Defendants for emotional distress pursuant to the Arkansas Constitution; Ark. Code Ann. §§ 16-123-101, *et seq.*; and 16-111-101, *et seq.*;
- d. The Court enter judgment in favor of Plaintiff for any and all costs associated with any action caused by evidence obtained through an unlawful search pursuant to the actions of the University of Arkansas and its agents pursuant to the Arkansas Constitution; Ark. Code Ann. §§ 16-123-101, *et seq.*; and 16-111-101, *et seq.*;
- e. The Court enter judgment in favor of Plaintiff for a refund of all tickets monies lost and any other monies paid under the illegal acts of the University of Arkansas Parking Ticket Regime pursuant to the Arkansas Constitution; Ark. Code Ann. §§ 16-123-101, *et seq.*; and 16-111-101, *et seq.*;
- f. The Court enter judgment in favor of Plaintiff for nominal damages pursuant to the Arkansas Constitution; Ark. Code Ann. §§ 16-123-101, *et seq.*; and 16-111-101, *et seq.*;
- g. The Court enter judgment in favor of Plaintiff for other compensatory damages pursuant to pursuant to the Arkansas Constitution; Ark. Code Ann. §§ 16-123-101, *et seq.*; and 16-111-101, *et seq.*;

- h. The Court enter judgment in favor of Plaintiff for attorney's fees and cost of litigation pursuant to the Arkansas Constitution; Ark. R. Civ. P. 23; Ark. Code Ann. §§ 16-123-101, *et seq.*; and 16-111-101, *et seq.*;
- i. The Court enter judgment in favor of Plaintiff against Defendants for punitive damages pursuant to Ark. Code Ann. §§ 16-123-107(b) and 16-123-108;
- j. The Court enter judgment in favor of Plaintiff on his individual claim, along with attorney's fees and costs of litigation pursuant to the Arkansas Constitution; Ark. Code Ann. §§ 16-123-101, *et seq.*; and 16-111-101, *et seq.*; 42 U.S.C §1988
- k. That this court finds that the University of Arkansas knew or reasonably should have known that the actions of their agents were outside of the color of law and acted unreasonably thereby losing any qualified immunity and that they may be personally liable for all costs and attorney's fees.
- l. Attorney's fees and other costs deemed appropriate by this court should be awarded under 42 U.S. Code § 1988.
- m. That this court allow the Plaintiff a remedy in the law for the injury and wrongs suffered at the hands of the agents of the University of Arkansas under Article 2 § 13 Redress for wrongs.
- n. Trial by jury as to all issues so triable, including disputed issues of fact underlying issues of law; and
- o. All other further relief as is just and equitable under the circumstances.

September 4, 2020

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Chris P. Corbitt", written in a cursive style.

/s/Chris P. Corbitt

Chris P. Corbitt, Ark Bar #2004089

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By /s/ Chris P. Corbitt

Chris P. Corbitt, Ark. Bar No. 2004089



## Your Permit Details

Below are the details for your Permit.

Permit Number	2028332
Type	20 Student PermitDirect
Amount Due	\$0.00
Status	Returned
Issue Date	08/09/2019
Effective Date	08/16/2019
Expiration Date	08/15/2020

### Associated Vehicles

Plate Number	Plate State	Vehicle Make	Vehicle Model	Vehicle Color
<a href="#">148VNJ (/cmn/detailvehicle.aspx?vehicle=413269)</a>	Arkansas	Jeep	Wrangler	White

### Associated Receipts

Receipt Number	Description	Permit Amount	Date	Payment Method
542860	Payment - Permit (2028332)	\$104.79	8/9/2019 10:14:40 AM	Discover

**No contract profiles were found on this record.**

**No space overages were found on this record.**

Add Vehicles To Permit



Transit and  
Parking

155  
Razorback  
Road

Fayetteville,  
AR 72701

(479) 575-  
PARK(7275)

Monday - Friday 7:00  
am - 5:00 pm

[parknet@uark.edu](mailto:parknet@uark.edu)

**EXHIBIT**

A1 - one page

## University of Arkansas

Transit and Parking Department  
155 S. Razorback Road  
Fayetteville, AR 72701

Elizabeth Corbitt  
eacorbit@uark.edu

### Courtesy Citation WARNING Notice

Transit and Parking records indicate you received a warning parking citation.

Please refer to the Parking and Traffic Regulations located at  
<http://parking.uark.edu/parking-services/parking-control/parking-and-traffic-regulations.php>

You may call (479) 575-7927 between 7:00 a.m. and 5:00 p.m., Monday through Friday if you have questions concerning this statement. We may also be contacted on the web at <http://parking.uark.edu>.

#### Warning

Please be advised that you have received a warning citation at LOT 56 D for Unauthorized Parking Space on 08/27/2019. Subsequent violations will result in a citation being issued with an associated fine.

#### Citation Information

Citation Number: 20203300123  
Issue Date/Time: 08/27/2019  
Violation: Unauthorized Parking Space  
Fine: \$0.00  
Location: LOT 56 D  
WARNING

#### Vehicle Information

License Plate: 148VNJ  
License State: AR  
Make: Jeep  
Color: White



## University of Arkansas

Transit and Parking Department  
155 S. Razorback Road  
Fayetteville, AR 72701

Elizabeth Corbitt  
eacorbit@uark.edu

Dear Elizabeth:

You have been offered a Zone 3 Resident parking permit for Lot 50. To purchase a parking permit, please come to our office at 155 Razorback Rd. The Zone 3 permit will cost \$641.85 and will be added to your student account.

You must respond by Tuesday, September 17, 2019 to accept your Zone 3 permit.

If you accept this offer, please know you will not be offered any other Resident or Garage permit this year.

This permit entitles you to park in the Resident spaces of Lot 50 and in Student and Remote parking lots on campus. The permit will expire May 31, 2020. Please contact Transit and Parking at 479-575-5373 if you have any questions about this information or parking on campus.

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Expiry Date  
09/17/2019

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Waiting List  
FY20 RR Zone 3

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**University of Arkansas**

Transit and Parking Department  
155 S. Razorback Road  
Fayetteville, AR 72701

September 13, 2019 2:43 pm

Elizabeth Corbitt  
10 Terra Cv

Receipt: 551044

Permit (2073154)

Qty: 1

641.85

Subtotal:

641.85

Total Due

641.85

Discover

641.85

Reference: 2120

Change Due

0.00

Drawer: Katherine W, Clerk: Katherin



## Resident Reserve Zone 3: Temporary Parking Permit

Permit # 2073154

**2073154**

**20RR3 Resident Reserved**

Place this Parking Permit on the **left** driver's side of the dashboard so that it is **completely** visible from outside of your vehicle. This permit must match your vehicle description.

Customer : 322015

Vehicle: Jeep-Wrangler-White 148VNJ-AR

Paid : \$641.85

UNIVERSITY OF ARKANSAS  
Transit & Parking Department

2711831

**2073154**



This permit is valid for 10 days from the issued date: 9/13/2019 2:43:45PM

**VEHICLE SUBJECT TO TOW AND IMPOUND IF IN VIOLATION OR IF PERMIT IS ALTERED.**

Parking and Traffic Regulations can be located at

<http://parking.uark.edu/parking-services/parking-control/parking-and-traffic-regulations.php>

Issued By: Katherin

Version: Friday, September 13, 2019 2:43:45PM

Please observe the following parking rules:

1. Display this permit by placing it on the left driver's side of the dashboard. It must be visible from outside the vehicle.  
If you purchased a **Resident Reserved Zone 3 Permit** designated as **20RR3** (located below your permit number on the top of this page) . This permit authorizes parking in UA parking lots: **50** and areas (lots) designated as **STUDENT (green)** and **REMOTE (orange)** located at the north end of the Baum Stadium West lot.
2. DO NOT PARK in NO PARKING areas; **RESERVED (blue)** , **FACULTY/STAFF (yellow)**; and UA parking meters (without paying meter fee); 24 hour reserved spaces or traffic lanes. If you have any questions or require special assistance, call the Transit and Parking Department at (479)575-PARK(7275).





EXHIBIT  
D

# University of Arkansas Fall 2019 Parking Map

\*Indicates lots projected to be completed by the beginning of the 2019 Fall semester.

Transit and Parking web site:

<http://parking.uark.edu>

Map last updated September 10, 2019

Subject to change at any time.

Lot sign designation takes precedence over map designation.

Changes may have occurred since the last update.  
For parking information regarding athletic or special events,  
please visit the Transit and Parking website or call  
(479) 575-7275 (PARK).

- Legend**
- Remote
  - Reserved
  - Faculty/Staff
  - Resident Reserved (9 months)
  - Student
  - Parking Meters
  - Short-term Meters
  - Parking Garage (Metered Parking Available)
  - Construction Area
  - Building Code
  - Under Construction
  - ADA Parking
  - Loading Zone
  - Motorcycle Parking
  - Scooter Parking
  - Reserved Scooter Parking
  - Night Reserved
  - No Overnight (See list below)
  - 1 47N
  - 55
  - 46E & 46W
  - 56E
  - MSPG
  - Parking Lot Number/Zone
  - Extended Hours
  - Visitor Meter Parking
  - Parking Garage (Metered Parking Available)
  - Park and Ride

## Accessible Building Entrances

- Accessible Entrances
- Power Assisted Doors
- Homing Control Point

\*Lots Projected to Open Fall 2019:  
77 Zones 17



## Building Codes

- |  |  |
|--|--|
| ABCM Baptist Collegiate Ministry (B-4)               | IDPA Indoor Practice Facility (D-2)  |
| ACOS Alpha Chi Omega Sorority (B-5)                  | INTK Randall Tyson Track Center (J-1)  |
| ADAMN Administration Building (B-3)                  | JERR Jerry and Jeanne Family Student-Athlete Success Center (E-2)                              |
| ADCA Adachi Hall A (north wing) (E-3)                | JBAR John Barnhill Arena (D-2)   |
| ADCB Adachi Hall B (south wing) (E-3)                | JHIT J.B. Hunt Transportation Center for Academic Excellence (D-4)                             |
| ADPS Alpha Delta Psi Sorority (B-4)                  | JTCD Janet Yvonne Child Development Center (A-4)   |
| ADSB Administrative Services Building (F-1)          | KAAO Kappa Alpha Order Fraternity (C-5)  |
| ADSL Agriculture and Life Sciences (B-3)             | KASF Kappa Sigma Fraternity (D-5)  |
| AGRI Agriculture (B-4)                               | KDLS Kappa Delta Sorority (B-6)  |
| AGRX Agriculture Annex (B-4)                         | KKKS Kappa Kappa Gamma Sorority (B-4)  |
| ALUM Alumni Center (C-2)                             | KKPS Kappa Kappa Psi Fraternity (D-4)  |
| ALPS Alpha Omicron Psi Sorority (B-5)                | LKAP Lambda Chi Alpha Fraternity (D-3)   |
| ALUM Alumni Center (C-2)                             | LIND 572 Lindell Avenue (A-3)  |
| ARKU Arkansas Union (C-3)                            | LISA Library Science Annex (G-1)   |
| ARMY Army ROTC (B-4)                                 | LSCT Lutheran Student Center (D-5)   |
| BAUD Lewis E. Bailey Band Building (C-3)             | MAIN Old Main (University Hall) (C-4)  |
| BBPC Basketball Performance Center (F-2)             | MARH Marston House (D-1)   |
| BBSA Baum Stadium (A-1)                              | MART St. Martin's Episcopal University Center (B-4)  |
| BBTR Baseball and Track Training Center (J-1)        | MCNL Office of Study Abroad (B-5)  |
| BKST University Bookstore (A-3)                      | MEET Mechanical Engineering (D-4)  |
| BKCA Botany Greenhouse (D-1)                         | MEMH Memorial Hall (B-4)   |
| BOCL Bogle Park (G-3)                                | MCHS Melroy House (University Press) (E-3)   |
| BUSB Bushman-Orvis (D-3)                             | MHRB Maple Hill East (A-2)   |
| BUSB Bushman-Orvis (D-3)                             | MHSR Maple Hill South (A-2)  |
| CAAC Chi Alpha Assembly of God Center (A-5)          | MFWR Maple Hill West (A-2)   |
| CARL Carroll Hall, the first at (C-3)                | MLKA MLK Annex (H-1)   |
| CCHP Challenger Plant 1-3 (D-4)                      | MLNML Old Credit Union (Formerly) (H-1)  |
| CERL Ceramic Studio (G-1)                            | MUSC Music Building (C-4)  |
| CHEM Chemistry (C-4)                                 | NAND Neuroscience Building (D-5)   |
| CHEN Chemistry (C-4)                                 | NNDN N.N. Duncan Ave. (E-3)  |
| CHFN Champions Hall (D-4)                            | NWQA Northwest Quad A (B-3)  |
| CHOS Chi Omega Sorority (B-3)                        | NWQB Northwest Quad B (B-3)  |
| COGT Chi Omega Greek Theater (C-3)                   | NWOC Northwest Quad C (A-3)  |
| CTMD Central Media Services (G-1)                    | NWQD Northwest Quad D (A-3)  |
| DAVS Davis Hall (B-3)                                | PAVI "Holding Pen" Pavilion (F-2)  |
| DDBS Delta Delta Delta Sorority (B-4)                | PHPS Phi Beta Psi Sorority (B-6)   |
| DCCA Delta Gamma Sorority (B-5)                      | PCMN United Campus Ministry (Presbyterian Church, Christian Church, Disciples of Christ) (B-4) |
| DILL Drill Drill Tennis Center (F-1)                 | PHDS Phi Delta Theta Fraternity (D-3)  |
| DISC Discovery Hall (C-4)                            | PHDS Phi Delta Theta Fraternity (D-3)  |
| DUNA Duncan Avenue Apartment A (D-5)                 | PHDS Phi Delta Theta Fraternity (D-3)  |
| DUNB Duncan Avenue Apartment B (D-5)                 | PHDS Phi Delta Theta Fraternity (D-3)  |
| DUNC Duncan Avenue Apartment C (D-5)                 | PHDS Phi Delta Theta Fraternity (D-3)  |
| DUNE Duncan Avenue Apartment D (E-5)                 | PHDS Phi Delta Theta Fraternity (D-3)  |
| DUNR Duncan Avenue Apartment E (E-5)                 | PHDS Phi Delta Theta Fraternity (D-3)  |
| EDAS 13 N Duncan South (B-5)                         | PHDS Phi Delta Theta Fraternity (D-3)  |
| EWHR Eastern Avenue Warehouse (G-1)                  | PHDS Phi Delta Theta Fraternity (D-3)  |
| ETHP Egle Center for Health Professions (A-2)        | PHDS Phi Delta Theta Fraternity (D-3)  |
| ETHP Environmental Health and Safety Storage (G-1)   | PHDS Phi Delta Theta Fraternity (D-3)  |
| FAMA Facilities Management (G-1)                     | PHDS Phi Delta Theta Fraternity (D-3)  |
| ENGR Engineering Hall (D-5)                          | PHDS Phi Delta Theta Fraternity (D-3)  |
| FARM Farm House Fraternity (F-5)                     | PHDS Phi Delta Theta Fraternity (D-3)  |
| FIAC Frank Bryan Athletic Complex (C-2)              | PHDS Phi Delta Theta Fraternity (D-3)  |
| FIRC Fred W. Smith Food Center (D-2)                 | PHDS Phi Delta Theta Fraternity (D-3)  |
| FERH Daniel E. Fierman Hall (C-4)                    | PHDS Phi Delta Theta Fraternity (D-3)  |
| FIB FIB House (E-3)                                  | PHDS Phi Delta Theta Fraternity (D-3)  |
| FORL Fayetteville Institute of Religion - LDS (B-5)  | PHDS Phi Delta Theta Fraternity (D-3)  |
| FNAR Fine Arts Center (C-3)                          | PHDS Phi Delta Theta Fraternity (D-3)  |
| FNR Founder Hall (D-3)                               | PHDS Phi Delta Theta Fraternity (D-3)  |
| FPCR Folklore Performing Arts Center (B-3)           | PHDS Phi Delta Theta Fraternity (D-3)  |
| FSC Freshman Center (D-3)                            | PHDS Phi Delta Theta Fraternity (D-3)  |
| FUTR Futrell Hall (B-3)                              | PHDS Phi Delta Theta Fraternity (D-3)  |
| FWCS Fowler Conservatory (B-1)                       | PHDS Phi Delta Theta Fraternity (D-3)  |
| FWR Fowler House (B-1)                               | PHDS Phi Delta Theta Fraternity (D-3)  |
| GACR Garland Avenue Center (A-3)                     | PHDS Phi Delta Theta Fraternity (D-3)  |
| GACS Garland Avenue Center (A-3)                     | PHDS Phi Delta Theta Fraternity (D-3)  |
| GARG Garland Avenue Center (A-3)                     | PHDS Phi Delta Theta Fraternity (D-3)  |
| GEAR Gear Hall (C-3)                                 | PHDS Phi Delta Theta Fraternity (D-3)  |
| GIBS Gibson Hall (C-3)                               | PHDS Phi Delta Theta Fraternity (D-3)  |
| GIBS Gibson Annex (C-3)                              | PHDS Phi Delta Theta Fraternity (D-3)  |
| GLAD Gladstone (D-3)                                 | PHDS Phi Delta Theta Fraternity (D-3)  |
| GRAD Graduate Education Building (C-4)               | PHDS Phi Delta Theta Fraternity (D-3)  |
| GRAS Graham East (B-1)                               | PHDS Phi Delta Theta Fraternity (D-3)  |
| GREG Gregson Hall (D-3)                              | PHDS Phi Delta Theta Fraternity (D-3)  |
| GRN Graham Northwest (F-1)                           | PHDS Phi Delta Theta Fraternity (D-3)  |
| GRNW Graham Northwest (F-1)                          | PHDS Phi Delta Theta Fraternity (D-3)  |
| HARP Hampton Avenue Parking Garage (D-4)             | PHDS Phi Delta Theta Fraternity (D-3)  |
| HEAT Heating Plant (D-4)                             | PHDS Phi Delta Theta Fraternity (D-3)  |
| HILL Hillside Auditorium (C-4)                       | PHDS Phi Delta Theta Fraternity (D-3)  |
| HEAT Heating Plant (D-4)                             | PHDS Phi Delta Theta Fraternity (D-3)  |
| HOEC Human Environmental Sciences (C-4)              | PHDS Phi Delta Theta Fraternity (D-3)  |
| HOEC Human Environmental Sciences (C-4)              | PHDS Phi Delta Theta Fraternity (D-3)  |
| HOTZ Hotz Hall (B-3)                                 | PHDS Phi Delta Theta Fraternity (D-3)  |
| HOUS Housing Office (A-4)                            | PHDS Phi Delta Theta Fraternity (D-3)  |
| HEPR Health, Physical Education and Recreation (D-2) | PHDS Phi Delta Theta Fraternity (D-3)  |
| HUMP Humphreys Hall (D-3)                            | PHDS Phi Delta Theta Fraternity (D-3)  |
| HUNT Silas Hunt Hall (B-3)                           | PHDS Phi Delta Theta Fraternity (D-3)  |
| IKNA Islamic Center of Northwest Arkansas (E-1)      | PHDS Phi Delta Theta Fraternity (D-3)  |
|  | PHDS Phi Delta Theta Fraternity (D-3)  |



## University of Arkansas

Transit and Parking Department  
155 S. Razorback Road  
Fayetteville, AR 72701

Elizabeth Corbitt  
eacorbitt@uark.edu

010906509

### Courtesy Citation Notice

Our records at the University of Arkansas Transit and Parking Department indicate that you received a parking citation.

Payment may be made online at <https://myparkingaccount.uark.edu>.

If you wish to pay by mail you can send a check to the address above, provided you do so within 30 days. Please list your account number on the check and make it payable to the University of Arkansas.

You may also pay in person at the address above from 8 a.m. to 5 p.m. Monday-Friday.

Please call (479) 575-7927 during regular office hours if you have questions. More parking information is available at <https://parking.uark.edu>.

If the citation is not paid within 30 days it will incur a \$10 late fee. Late fees of \$10 are also added after 60 days and after 90 days. Prompt payment is important to prevent any late fee charges.

Thank you for your attention to this matter.

### Contravention

Ticket #:	20202500436
Issue Date:	09/14/2019
Violation:	Athletics Prohibited by Sign
Amount Due:	\$100.00

### Vehicle

VIN:	
Plate #:	AR-148VNJ-NA
Year of Manufacture:	2012
Make:	Jeep
Model:	Wrangler
Color:	White



## University of Arkansas

Transit and Parking Department  
155 S. Razorback Road  
Fayetteville, AR 72701

### STATEMENT OF ACCOUNT

Elizabeth Corbitt

Letter Date: September 15, 2019

eacorbitt@uark.edu

Customer ID#: 010906509

Account #: 322015

The Transit and Parking Department of the University of Arkansas records indicate the parking citation(s) listed below have not been paid and are due. A late fee of \$10 is charged on each unpaid citation after 30, 60 and 90 days. Prompt payment of the violation citations will prevent the incurrance of a late payment charge. **Payments may be made on-line at: <https://myparkingaccount.uark.edu>.** If paid within 30 days, payment

may be made by mail with a check sent to the address listed above. Please list your account number on the check and make it payable to the University of Arkansas. You may also make a cash or check payment in person between 7:00 a.m. and 5:00 p.m., Monday through Friday.

PLEASE DISREGARD THIS NOTICE IF PAYMENT HAS ALREADY BEEN REMITTED, OR UNDER APPEAL.

You may call (479) 575-7927 between 7 a.m. and 5 p.m., Monday through Friday if you have questions concerning this statement. We may also be contacted on the web at <http://parking.uark.edu>.

#### CITATIONS

Date	Citation # Vehicle License #	Status Violation	Amount Due
1 09/14/2019	20202500436 AR-148VNJ-NA	Unpaid Athletics Prohibited by Sign	100.00
<b>Subtotal:</b>			<b>\$100.00</b>

**PAY THIS AMOUNT**

**\$100.00**



**Please Read Carefully Before Completing**

Upheld \_\_\_\_\_

Denied \_\_\_\_\_

Reduced \_\_\_\_\_

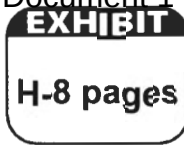
Warning \_\_\_\_\_

- Please Type or Print Legibly**
- | Appellant Name    | Faculty/Staff [ ] | Student [ ] | Visitor [ ] | UID#           |
|-------------------|-------------------|-------------|-------------|----------------|
| Appeal Address    | Last/Family       | First       |             | Phone          |
|                   | (Street Address)  | (City)      | (State)     | (Zip)          |
| Permanent Address |                   |             |             |                |
|                   | (Street Address)  | (City)      | (State)     | (Zip)          |
| Citation #        |                   |             |             | Date of Ticket |

Reason(s) for Appeal (Be specific, use back if necessary):

[illegible]

Date: \_\_\_\_\_ Signature: \_\_\_\_\_



**Chris Corbitt**

---

**From:** Elizabeth Corbitt <eacorbit@email.uark.edu>  
**Sent:** Friday, September 20, 2019 2:30 PM  
**To:** Chris Corbitt  
**Subject:** Fwd: Your feedback will help us better assist you

Sent from my iPhone

Begin forwarded message:

**From:** parknet <[parknet@uark.edu](mailto:parknet@uark.edu)>  
**Date:** September 20, 2019 at 2:27:15 PM CDT  
**To:** Elizabeth Corbitt <[eacorbit@email.uark.edu](mailto:eacorbit@email.uark.edu)>  
**Subject:** RE: Your feedback will help us better assist you

Elizabeth,

Our Director has stated that you have the right to either pay the citation or appeal it.

Thank you,

Katie  
Transit and Parking

-----Original Message-----

**From:** Elizabeth Corbitt <[eacorbit@email.uark.edu](mailto:eacorbit@email.uark.edu)>  
**Sent:** Friday, September 20, 2019 2:19 PM  
**To:** parknet <[parknet@uark.edu](mailto:parknet@uark.edu)>  
**Subject:** Re: Your feedback will help us better assist you

I plead not guilty and under the advice of council I plead the 5th amendment of the United States and Arkansas Constitution; therefore I cannot fill out the appeal form.

Ellie Corbitt

## Chris Corbitt

---

**From:** Elizabeth Corbitt <eacorbit@email.uark.edu>  
**Sent:** Sunday, September 15, 2019 12:24 PM  
**To:** Chris Corbitt  
**Subject:** Fwd: Student Statement  
**Attachments:** EntityStatement\_322015.pdf

Sent from my iPhone

Begin forwarded message:

**From:** <[parknet@uark.edu](mailto:parknet@uark.edu)>  
**Date:** September 15, 2019 at 6:48:58 AM CDT  
**To:** <[eacorbit@uark.edu](mailto:eacorbit@uark.edu)>  
**Subject:** Student Statement

Our records at the University of Arkansas Transit and Parking Department indicate that payment is due for the parking citation or citations listed below.

Please see the attached document regarding the details of this statement.



**University of Arkansas**

Transit and Parking Department  
 155 S. Razorback Road  
 Fayetteville, AR 72701

**STATEMENT OF ACCOUNT**

Elizabeth Corbitt

Letter Date: September 15, 2019

eacorbit@uark.edu

Customer ID#: 010906509

Account #: 322015

The Transit and Parking Department of the University of Arkansas records indicate the parking citation(s) listed below have not been paid and are due. A late fee of \$10 is charged on each unpaid citation after 30, 60 and 90 days. Prompt payment of the violation citations will prevent the incurrence of a late payment charge. **Payments may be made on-line at: <https://myparkingaccount.uark.edu>.** If paid within 30 days, payment

may be made by mail with a check sent to the address listed above. Please list your account number on the check and make it payable to the University of Arkansas. You may also make a cash or check payment in person between 7:00 a.m. and 5:00 p.m., Monday through Friday.

PLEASE DISREGARD THIS NOTICE IF PAYMENT HAS ALREADY BEEN REMITTED, OR UNDER APPEAL.

You may call (479) 575-7927 between 7 a.m. and 5 p.m., Monday through Friday if you have questions concerning this statement. We may also be contacted on the web at <http://parking.uark.edu>.

**CITATIONS**

Date	Citation # Vehicle License #	Status Violation	Amount Due
1 09/14/2019	20202500436 AR-148VNJ-NA	Unpaid Athletics Prohibited by Sign	100.00
		<b>Subtotal:</b>	<b>\$100.00</b>

**PAY THIS AMOUNT****\$100.00**

**Chris Corbitt**

---

**From:** Elizabeth Corbitt <eacorbit@email.uark.edu>  
**Sent:** Sunday, September 15, 2019 12:23 PM  
**To:** Chris Corbitt  
**Subject:** Fwd: Courtesy Citation Notice  
**Attachments:** CitationNotice\_881092.pdf

Sent from my iPhone

Begin forwarded message:

**From:** <[parknet@uark.edu](mailto:parknet@uark.edu)>  
**Date:** September 15, 2019 at 6:18:46 AM CDT  
**To:** <[eacorbit@uark.edu](mailto:eacorbit@uark.edu)>  
**Subject:** Courtesy Citation Notice

Our records at the University of Arkansas Transit and Parking Department indicate that you received a parking citation.

Please see the attached document regarding the details of this citation.

## University of Arkansas

Transit and Parking Department  
155 S. Razorback Road  
Fayetteville, AR 72701

Elizabeth Corbitt  
eacorbit@uark.edu

010906509

### Courtesy Citation Notice

Our records at the University of Arkansas Transit and Parking Department indicate that you received a parking citation.

Payment may be made online at <https://myparkingaccount.uark.edu>.

If you wish to pay by mail you can send a check to the address above, provided you do so within 30 days. Please list your account number on the check and make it payable to the University of Arkansas.

You may also pay in person at the address above from 8 a.m. to 5 p.m. Monday-Friday.

Please call (479) 575-7927 during regular office hours if you have questions. More parking information is available at <https://parking.uark.edu>.

If the citation is not paid within 30 days it will incur a \$10 late fee. Late fees of \$10 are also added after 60 days and after 90 days. Prompt payment is important to prevent any late fee charges.

Thank you for your attention to this matter.

### Contravention

Ticket #:	20202500436
Issue Date:	09/14/2019
Violation:	Athletics Prohibited by Sign
Amount Due:	\$100.00

### Vehicle

VIN:	
Plate #:	AR-148VNJ-NA
Year of Manufacture:	2012
Make:	Jeep
Model:	Wrangler
Color:	White

## Chris Corbitt

---

**From:** Elizabeth Corbitt <eacorbit@email.uark.edu>  
**Sent:** Saturday, September 14, 2019 9:07 AM  
**To:** Chris Corbitt  
**Subject:** Fwd: REMINDER: Football Game Priority Parking Lot Vacate Notice Colorado State versus Arkansas

Sent from my iPhone

Begin forwarded message:

**From:** <[parknet@uark.edu](mailto:parknet@uark.edu)>  
**Date:** September 13, 2019 at 2:56:52 PM CDT  
**To:** <[eacorbit@uark.edu](mailto:eacorbit@uark.edu)>  
**Subject:** REMINDER: Football Game Priority Parking Lot Vacate Notice Colorado State versus Arkansas

All vehicles parked in Razorback Foundation Priority Parking lots must be moved by 11:59 p.m. Friday, September 13, 2019 for the Colorado State versus Arkansas football game. These lots are designated by red and white signs at the entrance.

Vehicles left in Razorback Foundation Priority Parking lots after 11:59 p.m. will be cited and relocated (\$100) at the owner's expense. Vehicles relocated by the Razorback Foundation from Razorback Foundation Priority Parking lots will be towed to Lot 99 west of Baum Baseball Stadium on Beechwood Avenue.

The requirement to move vehicles does not apply to Resident Reserved permit holders parked in Resident Reserved lots. (Resident Reserved lots are not Razorback Foundation Priority Parking lots). Also, it does not apply to Harmon Avenue Parking Garage permit holders who are parking in the Harmon Avenue Parking Garage; nor does it apply to Garland Avenue Parking Garage permit holders when they are parked in the Garland Avenue Parking Garage. One exception in the Garland Garage is the metered parking spaces and the 30-minute parking spaces on level 3; individuals who have garage permits must not park there.

Scooters and motorcycles left in Razorback Foundation Priority Parking lots after 11:59 p.m. Friday, September 13, 2019 will be cited and relocated (\$100) at the owner's expense. Scooters and motorcycles relocated by the Razorback Foundation from Razorback Foundation Priority Parking lots will be towed to the scooter/motorcycle lot 17. Lot 17 is located on the east of the Walton College of Business off of Fairview Street. Scooters do not need to be moved from Scooter Reserved lot 7, if you have a permit for this lot.

If you are required to move your scooter/motorcycle we recommend you park in the scooter/motorcycle section of lot 17, the scooter parking on Buchanan Street, east of the Walton College of Business.

A map of these lots is located on the Transit and Parking website at  
[https://parking.uark.edu/resources/documents/football\\_parking.pdf](https://parking.uark.edu/resources/documents/football_parking.pdf)

If you are required to move your vehicle, we recommend that you park in Lot 99 west of Baum Baseball Stadium on Beechwood Avenue. Lot 99 is a remote parking lot that does not have to be vacated for

athletic events. Students with a UA parking permit may leave their vehicle in Lot 99 all semester if they do not want to relocate for athletic events. PLEASE NOTE: In the past, students could move their vehicles to the lots near Baum Baseball Stadium (Baum Main and Baum East) but this is no longer an option on game day. Those areas are needed for individuals who are working the game. Lot 99 is the best option available for students to re-locate vehicles.

Safe Ride Service operates Wednesday through Saturday nights from 11 p.m -3 a.m. It provides service to students from anywhere in the Fayetteville city limits, but will only transport individuals to their official residence as indicated in UA Connect.

Please contact Transit and Parking at 575-PARK (7275), email [parking@uark.edu](mailto:parking@uark.edu) or check the web at <http://parking.uark.edu> menu item "Parking Services" then "Athletic Events Parking" if you have questions concerning campus football parking.

## Citation Appeal Information

- [U of A](#)
- [Transit and Parking](#)
- [Parking Service](#)
- [Parking Control](#)
- Citation Appeal Information

## Parking Citation Appeals Information

Any written appeal for consideration by the Traffic Appeals Committee is to be made at the Transit and Parking Department within five class days after the date of the ticket. After five class days and up to 90 days, the ticket may still be appealed, however, it must be paid first. After 90 days, the citation cannot be appealed. Your copy of the ticket must be filed with the appeal. Each ticket must be appealed on a separate form.

A \$10 processing fee will be charged per ticket when the appeal is filed. The fee will be refunded only if the appeal is upheld. A lost ticket, forgetfulness, parking only for a short period, failure to display a parking permit, or not seeing the signs are not grounds for an appeal.

The initial written appeal will be reviewed to determine if it meets administrative guidelines. If it does not, the initial appeal will be denied. If denied the appellant may present his or her case orally before the entire committee, provided the administrative guidelines have been met.

### **To appeal a parking citation:**

Obtain a written appeal form from the Transit and Parking Department in the Administrative Services Building, 155 South Razorback Road or use the [online pdf version](#).

Remember an appeal must address the violation and be based on very extenuating circumstances.

Pay the processing fee and pay the ticket, if it is over five class days old.

The written appeal will be reviewed to determine if it meets administrative guidelines, if not the appeal will be denied.

A letter will be sent to the appellant's address informing them of the decision of the Traffic Appeals Committee.

If the appeal has been denied the appellant may contact the Transit and Parking Department at 479-575-8738 or by email to Carla Foster at [carlah@uark.edu](mailto:carlah@uark.edu) to request an appointment for an oral appeal.

The Traffic Appeals Committee only meets once per month. During the month of August the Traffic Appeals Committee may not meet.



**UNIVERSITY OF ARKANSAS  
AUXILIARY ENTERPRISES  
PARKING**

Statement of Estimated Income and Expenditures  
for the Fiscal Year Ending June 30, 2016

	<u>INTERNAL</u>	<u>EXTERNAL</u>	<u>TOTAL</u>
<b>INCOME</b>			
Vehicle Registration	\$ 387,600	\$ 4,712,400	\$ 5,100,000
Traffic Fines		1,015,000	1,015,000
Parking Meters		165,000	165,000
SDPF	86,775	358,225	445,000
HAPF	54,750	675,250	730,000
GAPG	67,800	232,200	300,000
MSPG	792	71,208	72,000
Advertising		5,300	5,300
Vending		15,400	15,400
ENRC	77,000		77,000
Charters	171,081	17,036	188,117
Special Events	80,000	10,000	90,000
Boot and Tow		<del>40,000</del>	40,000
<b>Total Income</b>	<b>\$ 925,798</b>	<b>\$ 7,317,019</b>	<b>\$ 8,242,817</b>
<b>EXPENDITURES</b>			
Salaries - Classified			\$ 858,940
Salaries - Non-Classified			45,000
SalSumAL			18,780
Wages - Student			111,490
Wages - Non-Student			466,980
Other Compensation			128,600
Fringe Benefits			272,217
General Expenses			611,799
Utilities			1,010
Parking Improvements			607,495
Debt Service			3,845,510
SDPF Expenses			137,000
HAPF Expenses			360,000
GAPG Expenses			90,000
MSPG Expenses			7,800
Deck Capital Maintenance			566,196
Bad Debt			25,000
UBIT			1,000
Travel			10,000
Capital Outlay			<del>78,000</del>
<b>Total Operating Expenditures</b>			<b>\$ 8,242,817</b>
<b>Less: E&amp;G Chargebacks (Internal)</b>			<b>(925,798)</b>
<b>Total Expenditures (External)</b>			<b>\$ 7,317,019</b>

**UNIVERSITY OF ARKANSAS  
AUXILIARY ENTERPRISES  
PARKING**

**Statement of Estimated Income and Expenditures  
for the Fiscal Year Ending June 30, 2017**

	<u>INTERNAL</u>	<u>EXTERNAL</u>	<u>TOTAL</u>
<b>INCOME</b>			
Vehicle Registration	\$ 585,730	\$ 5,271,573	\$ 5,857,303
Traffic Fines		1,140,000	1,140,000
Parking Meters		189,852	189,852
SDPF	105,840	451,211	557,051
HAPF	57,072	758,242	815,314
GAPG	98,122	294,365	392,487
MSPG	8,772	94,428	103,200
Advertising		6,495	6,495
Vending		15,200	15,200
ENRC	81,907		81,907
Charters	201,890	25,960	227,850
Special Events	79,720	9,954	89,674
Boot and Tow		45,456	45,456
	<u>          </u>	<u>          </u>	<u>          </u>
<b>Total Income</b>	<b>\$ 1,219,053</b>	<b>\$ 8,302,736</b>	<b>\$ 9,521,789</b>
<b>EXPENDITURES</b>			
Salaries - Classified			\$ 979,870
Salaries - Non-Classified			47,507
SalSumAL			2,804
Wages - Student			93,032
Wages - Non-Student			458,544
Other Compensation			134,605
Fringe Benefits			332,732
General Expenses			1,524,878
Utilities			776
Parking Improvements			625,720
Debt Service			3,845,510
SDPF Expenses			
HAPF Expenses			
GAPG Expenses			
MSPG Expenses			
Deck Capital Maintenance			1,087,311
Bad Debt			25,000
UBIT			1,000
Travel			12,500
Capital Outlay			350,000
			<u>          </u>
<b>Total Operating Expenditures</b>			<b>\$ 9,521,789</b>
<b>Less: E&amp;G Chargebacks (Internal)</b>			<u><b>(1,219,053)</b></u>



**Total Expenditures (External)**

**\$ 8,302,736**

**UNIVERSITY OF ARKANSAS**  
**AUXILIARY ENTERPRISES**  
**PARKING**  
**Statement of Estimated Income and Expenditures**  
**for the Fiscal Year Ending June 30, 2018**

	<u>INTERNAL</u>	<u>EXTERNAL</u>	<u>TOTAL</u>
<b>INCOME</b>			
Vehicle Registration	\$ 602,801	\$ 5,425,212	\$ 6,028,013
Traffic Fines		1,246,401	1,246,401
Parking Meters		200,942	200,942
SDPF	129,626	552,617	682,243
HAPF	58,607	778,635	837,242
GAPG	99,067	297,201	396,268
MSPG	1,868	96,428	98,296
Advertising		10,080	10,080
Vending		16,072	16,072
Special Events	87,630	10,941	98,571
Boot and Tow		51,941	51,941
	<u>          </u>	<u>          </u>	<u>          </u>
<b>Total Income</b>	<b>\$ 979,599</b>	<b>\$ 8,686,470</b>	<b>\$ 9,666,069</b>
<b>EXPENDITURES</b>			
Salaries - Classified			\$ 893,557
Salaries - Non-Classified			107,532
SalSumAL			6,233
Wages - Student			76,329
Wages - Non-Student			197,089
Other Compensation			88,935
Fringe Benefits			327,854
General Expenses			339,390
Utilities			
Parking Improvements			1,200,000
Debt Service			3,845,510
SDPF Expenses			
HAPF Expenses			
GAPG Expenses			
MSPG Expenses			
Deck Operations/Maintenance			2,182,640
Bad Debt			25,000
UBIT			1,000
Travel			25,000
Capital Outlay			350,000
			<u>          </u>
<b>Total Operating Expenditures</b>			<b>\$ 9,666,069</b>
<b>Less: E&amp;G Chargebacks (Internal)</b>			<u>(979,599)</u>
<b>Total Expenditures (External)</b>			<b>\$ 8,686,470</b>

**UNIVERSITY OF ARKANSAS  
AUXILIARY ENTERPRISES  
PARKING**

**Statement of Estimated Income and Expenditures  
for the Fiscal Year Ending June 30, 2019**

	<u>INTERNAL</u>	<u>EXTERNAL</u>	<u>TOTAL</u>
<b>INCOME</b>			
Vehicle Registration	\$ 564,547	\$ 5,106,880	\$ 5,671,427
Traffic Fines		1,195,755	1,195,755
Parking Meters		194,044	194,044
SDPF	117,212	606,820	724,032
HAPF	52,396	789,022	841,418
GAPG	128,171	339,551	467,722
MSPG	1,736	100,706	102,442
ARTP	81,096		81,096
Charters	187,331	69,679	257,010
Advertising		10,080	10,080
Vending		16,192	16,192
Special Events	87,581	167,939	255,520
Boot and Tow		52,397	52,397
	<u>          </u>	<u>          </u>	<u>          </u>
<b>Total Income</b>	<b>\$ 1,220,070</b>	<b>\$ 8,649,065</b>	<b>\$ 9,869,135</b>
<b>EXPENDITURES</b>			
Salaries - Classified			\$ 1,035,784
Salaries - Non-Classified			116,574
SalSumAL			20,900
Wages - Student			83,755
Wages - Non-Student			271,108
Other Compensation			118,620
Fringe Benefits			357,809
General Expenses			3,799,984
Debt Service			4,064,601
			<u>          </u>
<b>Total Operating Expenditures</b>			<b>\$ 9,869,135</b>
<b>Less: E&amp;G Chargebacks (Internal)</b>			<u>(1,220,070)</u>
<b>Total Expenditures (External)</b>			<b>\$ 8,649,065</b>

**UNIVERSITY OF ARKANSAS  
AUXILIARY ENTERPRISES  
PARKING**

**Statement of Estimated Income and Expenditures  
for the Fiscal Year Ending June 30, 2020**

	<u>INTERNAL</u>	<u>EXTERNAL</u>	<u>TOTAL</u>
<b>INCOME</b>			
Vehicle Registration	\$ 564,166	\$ 5,414,768	\$ 5,978,934
Traffic Fines		1,211,912	1,211,912
Parking Meters		198,718	198,718
SDPF	103,634	580,870	684,504
HAPF	49,093	769,614	818,707
GAPG	116,132	336,654	452,786
MSPG	1,690	94,833	96,523
ARTP	110,000		110,000
Charters	178,500	73,900	252,400
Advertising		2,986	2,986
Vending		8,500	8,500
Special Events	166,772	181,327	348,099
Saferide	128,415		128,415
Boot and Tow		42,097	42,097
<b>Total Income</b>	<b>\$ 1,418,402</b>	<b>\$ 8,916,179</b>	<b>\$ 10,334,581</b>
<b>EXPENDITURES</b>			
Salaries - Classified			\$ 1,170,049
Salaries - Non-Classified			333,591
SalSumAL			24,325
Wages - Student			86,881
Wages - Non-Student			323,552
Other Compensation			118,706
Fringe Benefits			438,224
General Expenses			3,640,260
Debt Service			4,198,993
<b>Total Operating Expenditures</b>			<b>\$ 10,334,581</b>
<b>Less: E&amp;G Chargebacks (Internal)</b>			<b>(1,418,402)</b>
<b>Total Expenditures (External)</b>			<b>\$ 8,916,179</b>

## Chris Corbitt

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**From:** parknet <parknet@uark.edu>  
**Sent:** Thursday, January 2, 2020 12:38 PM  
**To:** Chris Corbitt  
**Subject:** RE: appeal form attached  
**Attachments:** Appeal.JPG

Unfortunately according to our policy a citation over 90 days can no longer be appealed. Please see attached information.

Marilyn

**From:** Chris Corbitt <chris@corbittlawfirm.com>  
**Sent:** Thursday, December 26, 2019 3:17 PM  
**To:** parknet <parknet@uark.edu>  
**Subject:** appeal form attached

Katie,

Please see the attached appeal form.

Proceed accordingly.

Regards,

Chris



Chris P. Corbitt, P.E., Esq.  
U.S. Patent Attorney  
Attorney at Law

Address:

Corbitt Law Firm  
PO Box 4368  
Little Rock, AR 72214  
Email: [chris@corbittlawfirm.com](mailto:chris@corbittlawfirm.com)

Contact Info:

[www.corbittlawfirm.com](http://www.corbittlawfirm.com)  
Cell: 501-258-6719  
Phone: 501-907-2727  
Fax: 888-838-9096

### **CONFIDENTIALITY NOTICE**

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JS 44 (Rev. 09/19)

**CIVIL COVER SHEET** 4:20-cv-1070-JM

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**

Elizabeth Ann Corbitt

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

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

Chris P. Corbitt

Corbitt Law Firm, PO Box 4368, Little Rock, AR 72214

**DEFENDANTS**

Board of Trustees of the Univ. of Arkansas System

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

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

Attorneys (If Known)

David Curran

**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 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 type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <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>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 <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

**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):  
injunctive relief under 42 U.S.C. 1983, 1988, Fed. R. Civ. Pro. Rule 65, 28 U.S.C. 2201

Brief description of cause:

class action violation of due process under 14th amendment, 5th amendment rights,

**VII. REQUESTED IN COMPLAINT:**

☒ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

**DEMAND \$**

3,000,000.00

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 \_\_\_\_\_

# ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Class Action Claims University of Arkansas Enforces Parking Violations Without Notice, Due Process](#)

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