

JUN 12 2017

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF ARKANSAS  
WESTERN DIVISION**

JAMES W. McCORMACK, CLERK  
By: [Signature] DEP CLERK

**MICHAEL REICHERT, et al.**  
Plaintiffs,

v.

**MICHAEL P. HUERTA, AS ADMINISTRATOR,  
FEDERAL AVIATION ADMINISTRATION,**  
Defendant

CASE NO. 4:17-cv-389-BRW  
This case assigned to District Judge Wilson  
and to Magistrate Judge Ray

**JURY TRIAL DEMANDED**

**CLASS ACTION COMPLAINT**

1. In 2012, Congress directed the Administrator of the Federal Aviation Administration (“FAA”) not to “promulgate any rule or regulation regarding model aircraft” flown for recreational or hobby use under the FAA Modernization and Reform Act of 2012. Pub. L. 112-95, § 336(a), 126 Stat. 11, 77 (2012) (codified at 49 U.S.C. § 40101 note) (hereafter “FAA Modernization and Reform Act of 2012”). Contrary to this clear directive, the FAA has been exacting money and personal data illegally since at least December 21, 2015, from the very hobbyists Congress expressly exempted from FAA regulatory jurisdiction, by requiring the registration of model aircraft for recreational or hobbyist purposes. *Taylor v. Huerta*, 856 F.3d 1089 (D.C. Cir. 2017).

2. Pursuant to the Little Tucker Act, 28 U.S.C. § 1346, Plaintiff Michael Reichert, on behalf of himself and all members of the proposed Class of all owners of model aircraft who registered their model aircraft with the FAA, seeks an order requiring the FAA to: (a) refund the \$5 registration fee that each proposed Class member paid; (b) destroy all records collected or created for each proposed Class member; (c) remove any reference to each proposed Class member’s registration and (d) pay all costs, disbursements and reasonable attorneys’ fees incurred by the proposed Class in this action per 28 U.S.C. § 2412 or 28 U.S.C. § 1346.

### **THE PARTIES**

3. Plaintiff Michael Reichert is a resident of Pulaski County, Arkansas.

4. Michael P. Huerta is the administrator of the FAA and is the appropriate individual to sue in his official capacity on behalf of the FAA, which is part of the U.S. Department of Transportation. The FAA's address is 800 Independence Avenue SW, Washington, D.C. 20591.

### **JURISDICTION AND VENUE**

5. This Court has original subject-matter jurisdiction over this action because it involves a federal question under 28 U.S.C. § 1331 and a civil claim of not more than \$10,000 per claimant against the United States founded upon an act of Congress or a regulation of an executive department under 28 U.S.C. § 1346(a)(2) of the Little Tucker Act.

6. Venue is proper under 28 U.S.C. § 1391 because the FAA is subject to personal jurisdiction here and regularly conducts business in the Eastern District of Arkansas and because a substantial part of the claims asserted herein occurred and continue to occur in this district.

### **FACTUAL ALLEGATIONS**

7. In 2012, Congress put an end to the "debate over regulation of unmanned aircraft" and passed the FAA Modernization and Reform Act of 2012, which "codified the FAA's longstanding hands-off approach to the regulation of model aircraft" under § 336 of the Act, called the "Special Rule for Model Aircraft." *Taylor*, 856 F.3d at 1091.

8. The FAA Modernization and Reform Act of 2012 § 336(a) says, "Notwithstanding any other provision of law relating to the incorporation of unmanned aircraft . . . the Administrator of the Federal Aviation Administration may not promulgate any rule or regulation regarding model aircraft . . ." FAA Modernization and Reform Act of 2012.

9. The FAA Modernization and Reform Act of 2012 § 336(c) defines model aircraft

(hereafter “Model Aircraft”) as “unmanned aircraft” that is “(1) capable of sustained flight in the atmosphere; (2) flown within visual line of sight of the person operating the aircraft; and (3) flown for hobby or recreational purposes.” FAA Modernization and Reform Act of 2012.

10. In direct violation of Congress’s explicit prohibition against such rule-making, the FAA promulgated rules or regulations December 16, 2015, to require all Model Aircraft hobbyists to register online their Model Aircraft, pay a \$5 registration fee, provide detailed information on the owner and be subject to criminal jail time up to three years and fines up to \$250,000 for not registering these toys. Registration and Marking Requirements for Small Unmanned Aircraft, 80 Fed. Reg. 78594 (Dec. 16, 2015), which amended Title 14 of the Code of Federal Regulations (“Registration Rule”).

11. Effective December 21, 2015, the Registration Rule requires “[a]ny small unmanned aircraft to be used exclusively as [M]odel [A]ircraft that have never been operated” to be registered with the FAA. *Id.*

12. Effective February 19, 2016, the Registration Rule requires “[s]mall unmanned aircraft to be used exclusively as Model Aircraft and have been operated by their owner prior to December 21, 2015,” to be registered with the FAA. *Id.*

13. After Plaintiff registered his Model Aircraft, paid a \$5 registration fee and provided the required personal information, the FAA issued him a *Small UAS Certificate of Registration* on February 19, 2016.

14. As of December 21, 2016, more than 616,000 members of the proposed Class had registered their Model Aircrafts with the FAA, paid the FAA a \$5 registration fee and provided personal information to the FAA. [www.faa.gov/news/updates/?newsId=87049](http://www.faa.gov/news/updates/?newsId=87049) (December 21, 2016).

15. On May 19, 2017, the U.S. Appeals Court for the District of Columbia held, “The FAA’s 2015 Registration Rule, which applies to Model Aircraft, directly violates that clear statutory prohibition . . . [so we] vacate the Registration Rule to the extent it applies to Model Aircraft.” *Taylor*, 856 F.3d at 1090.

16. On May 19, 2017, the FAA issued a press release stating it would continue to regulate Model Aircraft and continue to accept registrations. [https://www.faa.gov/news/press\\_releases/news\\_story.cfm?newsId=21674](https://www.faa.gov/news/press_releases/news_story.cfm?newsId=21674). The FAA stated, “We continue to encourage registration for all drone operators.” *Id.*

17. Upon learning of the D.C. Circuit Court’s holding, Plaintiff electronically communicated a request to the FAA on June 2, 2017, for a refund of his \$5 registration fee and for his name to be removed from the FAA’s databases. Later that day, the FAA through its [support@federaldroneregistration.com](mailto:support@federaldroneregistration.com) address emailed the Plaintiff: “We recommend contacting the FAA directly via [uashelp@faa.gov](mailto:uashelp@faa.gov) or by calling 844-FLY-MY-UA for assistance. You can also visit <https://www.faa.gov/uas/faqs/> for more information.” As directed by the FAA email, Plaintiff called the FAA that same day and left a message substantially similar to his email request. As of the filing date, Plaintiff has not received a return call.

18. Despite having its rules against requiring Model Aircraft registration vacated by *Taylor*, the FAA’s website as of today’s filing continues to require hobbyists to pay money ([www.faa.gov/uas/faqs/#reg](http://www.faa.gov/uas/faqs/#reg)) to register their Model Aircraft weighing more than 0.55 pounds and to disclose personal information when the owners want to “fly for fun.” [https://www.faa.gov/uas/getting\\_started/](https://www.faa.gov/uas/getting_started/).

### **CLASS ALLEGATIONS**

19. Plaintiff brings this action individually and on behalf of all others similarly situated

under the Federal Rules of Civil Procedure, Rule 23. This action satisfies the numerosity, commonality, typicality and adequacy prerequisites under Rule 23(a). In addition, this action satisfies the requirements of Rule 23(b)(3) and, alternatively, Rule 23(b)(2).

20. The proposed Class is defined as the following:

All owners of Model Aircraft who registered their Model Aircraft with the FAA.

21. Plaintiff reserves the right to modify or amend the definition of the proposed Class before the Court determines whether certification is appropriate.

22. Proposed Class counsel, any judge who hears this case, and the United States and its agencies and instrumentalities are excluded from the proposed Class.

23. The members of the proposed Class are so numerous that joinder is impractical. The proposed Class consists of hundreds of thousands of members, the identity of whom is within the knowledge of the FAA and can be ascertained by access to FAA records.

24. The claims of the representative Plaintiff are typical of the proposed Class members' claims. Each registered his or her Model Aircraft, paid the FAA a \$5 registration fee and disclosed personal information. The FAA's misconduct violated federal statutes that specifically prohibit the agency from making the rules or regulations above, which similarly damaged the representative Plaintiff and all members of the proposed Class.

25. Furthermore, the factual basis of the FAA requiring hobbyists to register their Model Aircraft violates § 338 of the FAA Modernization and Reform Act of 2012. The FAA's illegal conduct is common to all members of the proposed Class and represents a common thread of illegal conduct resulting in injury to all members of the proposed Class.

26. There are multiple questions of law and fact common to the proposed Class, and those common questions predominate over all questions affecting only individual proposed Class

members. Among the questions of law and fact common to the proposed Class are:

- a. Whether the FAA's actions applied generally to the proposed Class under Rule 23(b)(2) because the FAA imposed the same illegal requirements on each Model Aircraft owner: a registration fee, disclosure of personal data, and display of an FAA-issued unique identifier on each Model Aircraft;
- b. Whether the Registration Rule violated § 336 of the FAA Modernization and Reform Act of 2012;
- c. Whether the FAA continues to commit wrongdoing through its failure to comply with § 336 of the FAA Modernization and Reform Act of 2012;
- d. Whether restitution of registration fees is an appropriate remedy;
- e. The proper method or methods by which to measure damages; and
- f. The proper injunctive relief.

27. Plaintiff's claims are typical of the claims of other proposed Class members in that they arise out of the same failure on the part of the FAA to comply with federal law, and Plaintiff and all members of the proposed Class paid the same registration fee, had to disclose personal information as part of the registration process, and are required to affix a unique identification number to their Model Aircraft.

28. Plaintiff has suffered the harm alleged and has no interests antagonistic to the interests of any proposed Class member.

29. Plaintiff is committed to the vigorous prosecution of this action and has retained competent counsel experienced in the prosecution of class actions. Thus, Plaintiff is an adequate representative and will fairly and adequately protect the interests of the proposed Class.

30. A class action is superior to other available methods for the fair and efficient

adjudication of this controversy. Because the claim amount for each proposed Class member is very small relative to the complexity of the litigation and the United States Government has virtually unlimited financial resources, no proposed Class member could afford to seek legal redress individually for the claims alleged herein. Therefore, absent a class action, each proposed Class member will continue to suffer losses, expend needless energy resolving one's claim and protecting one's privacy, and be at the mercy of the FAA's misconduct without remedy.

31. Even if each proposed Class member could afford to litigate individually, the court system could not. Given the complex legal and factual issues involved, individualized litigation would significantly increase the delay and expense to all parties and to the Court. Individualized litigation also would create the potential for inconsistent or contradictory rulings. By contrast, a class action presents far fewer management difficulties, allows claims to be heard which might otherwise go unheard because of the relative expense of bringing individual lawsuits and provides the benefits of adjudication, economies of scale and comprehensive supervision by a single court.

32. Alternatively, class certification is appropriate pursuant to Rule 23(b)(2). In acting as alleged above, and in failing and refusing to cease and desist despite contrary directives from Congress and rulings by the D.C. Circuit, Defendant has acted on grounds generally applicable to the entire proposed Class, thereby making final injunctive relief and corresponding declaratory and equitable relief appropriate with respect to the proposed Class as a whole. The prosecution of separate actions by individual proposed Class members would create the risk of inconsistent or varying adjudications with respect to individual proposed Class members that would establish incompatible standards of conduct. In addition, injunctive relief is necessary to prevent further unlawful and unfair conduct by Defendant. Money damages, alone, could not afford adequate and complete relief, and injunctive relief is necessary to restrain Defendant from continuing to commit

its illegal acts.

**CLAIM FOR RELIEF: ILLEGAL EXACTION**  
(Violation of Little Tucker Act, 28 U.S.C. § 1346)

33. Plaintiff repeats paragraphs 1 through 32 above.

34. Plaintiff and the proposed Class bring this action under the Little Tucker Act, 28 U.S.C. § 1346, which waives sovereign immunity and “provides jurisdiction to recover an illegal exaction by government officials when the exaction is based on an asserted statutory power.” *Aerolineas Argentina v. United States*, 77 F.3d 1564, 1572-74 (Fed. Cir. 1996) (allowing an illegal-exaction claim for excess user fees).

35. Regardless of whether a statute creates an express cause of action, courts have a history of recognizing such illegal-exaction claims when the government takes money from a claimant in violation of a statute. *Norman v. United States*, 429 F.3d 1081, 1095 (Fed. Cir. 2005).

36. Here, hundreds of thousands of people were forced to pay a registration fee, give up personal information and suffer other indignities with little, if any, public gain because of an overreaching administrator at the FAA who acted in violation of § 338 of the FAA Modernization and Reform Act of 2012.

37. Plaintiff and members of the proposed Class have sustained damages from the FAA’s disregard for Congressional authority forbidding the FAA from regulating hobbyist and recreational use of Model Aircraft as alleged herein, which continues to also violate privacy rights and has exacted money from hundreds of thousands of Model Aircraft owners.

38. Plaintiff, on behalf of himself and proposed Class members, demands a jury trial.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff, on behalf of himself and all Class Members, request that judgment be entered against Defendant and that the Court grant the following relief:



- A. An order determining that this action may be maintained as a class action pursuant to Rule 23(b)(3), or alternatively Rule 23(b)(2), of the Federal Rules of Civil Procedure, that Plaintiff is a proper class representative, that Plaintiff's attorneys be appointed Class counsel pursuant to Rule 23(g) of the Federal Rules of Civil Procedure, and that Class notice be promptly issued;
- B. Judgment against Defendant for Plaintiffs' and Class Members' asserted causes of action;
- C. Appropriate declaratory relief against Defendant;
- D. An award of damages to Plaintiff and Class Members and restitution of all monies collected during the registration process;
- E. Preliminary and permanent injunctive relief against Defendant, including but not limited to destruction of all records collected or created on every Class member and removal of any reference to each Class member's registration;
- F. An award of reasonable attorney's fees and other litigation costs reasonably incurred pursuant to 28 U.S.C. § 2412, 28 U.S.C. § 1346 and any other applicable law; and
- G. Any and all additional relief to which Plaintiff and Class Members may be entitled.

Dated: June 12, 2017

Respectfully submitted,

Hank Bates, ABN 98063  
Allen Carney, ABN 94122  
Randall K. Pulliam, ABN 98015  
CARNEY BATES & PULLIAM  
519 West 7<sup>th</sup> Street  
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BY:   
HANK BATES, ABN 98063

JS 44 (Rev. 06/17)

# CIVIL COVER SHEET 4:17-cv-389-BRW

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**  
 Reichert, Michael, et al.

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

**(c) Attorneys (Firm Name, Address, and Telephone Number)**  
 Carney Bates & Pulliam, PLLC - Hank Bates  
 519 West 7th Street, Little Rock, Arkansas 72201  
 Work: 501-312-8500

**DEFENDANTS**  
 FAA - Michael P. Huerta, Administrator

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

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

Attorneys (If Known)

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

1 U.S. Government Plaintiff

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 type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated <i>or</i> 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 <i>and</i> 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<br><input type="checkbox"/> 120 Marine<br><input type="checkbox"/> 130 Miller Act<br><input type="checkbox"/> 140 Negotiable Instrument<br><input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment<br><input type="checkbox"/> 151 Medicare Act<br><input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)<br><input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits<br><input type="checkbox"/> 160 Stockholders' Suits<br><input type="checkbox"/> 190 Other Contract<br><input type="checkbox"/> 195 Contract Product Liability<br><input type="checkbox"/> 196 Franchise | <b>PERSONAL INJURY</b><br><input type="checkbox"/> 310 Airplane<br><input type="checkbox"/> 315 Airplane Product Liability<br><input type="checkbox"/> 320 Assault, Libel & Slander<br><input type="checkbox"/> 330 Federal Employers' Liability<br><input type="checkbox"/> 340 Marine<br><input type="checkbox"/> 345 Marine Product Liability<br><input type="checkbox"/> 350 Motor Vehicle<br><input type="checkbox"/> 355 Motor Vehicle Product Liability<br><input type="checkbox"/> 360 Other Personal Injury<br><input type="checkbox"/> 362 Personal Injury - Medical Malpractice | <b>PERSONAL INJURY</b><br><input type="checkbox"/> 365 Personal Injury - Product Liability<br><input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury<br><input type="checkbox"/> 368 Asbestos Personal Injury Product Liability<br><b>PERSONAL PROPERTY</b><br><input type="checkbox"/> 370 Other Fraud<br><input type="checkbox"/> 371 Truth in Lending<br><input type="checkbox"/> 380 Other Personal Property Damage<br><input type="checkbox"/> 385 Property Damage Product Liability | <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881<br><input type="checkbox"/> 690 Other<br><b>LABOR</b><br><input type="checkbox"/> 710 Fair Labor Standards Act<br><input type="checkbox"/> 720 Labor/Management Relations<br><input type="checkbox"/> 740 Railway Labor Act<br><input type="checkbox"/> 751 Family and Medical Leave Act<br><input type="checkbox"/> 790 Other Labor Litigation<br><input type="checkbox"/> 791 Employee Retirement Income Security Act<br><b>IMMIGRATION</b><br><input type="checkbox"/> 462 Naturalization Application<br><input type="checkbox"/> 465 Other Immigration Actions | <input type="checkbox"/> 422 Appeal 28 USC 158<br><input type="checkbox"/> 423 Withdrawal 28 USC 157<br><b>PROPERTY RIGHTS</b><br><input type="checkbox"/> 820 Copyrights<br><input type="checkbox"/> 830 Patent<br><input type="checkbox"/> 835 Patent - Abbreviated New Drug Application<br><input type="checkbox"/> 840 Trademark<br><b>SOCIAL SECURITY</b><br><input type="checkbox"/> 861 HIA (1395ff)<br><input type="checkbox"/> 862 Black Lung (923)<br><input type="checkbox"/> 863 DIWC/DIWW (405(g))<br><input type="checkbox"/> 864 SSID Title XVI<br><input type="checkbox"/> 865 RSI (405(g))<br><b>FEDERAL TAX SUITS</b><br><input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)<br><input type="checkbox"/> 871 IRS—Third Party 26 USC 7609 | <input type="checkbox"/> 375 False Claims Act<br><input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))<br><input type="checkbox"/> 400 State Reapportionment<br><input type="checkbox"/> 410 Antitrust<br><input type="checkbox"/> 430 Banks and Banking<br><input type="checkbox"/> 450 Commerce<br><input type="checkbox"/> 460 Deportation<br><input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations<br><input type="checkbox"/> 480 Consumer Credit<br><input type="checkbox"/> 490 Cable/Sat TV<br><input type="checkbox"/> 850 Securities/Commodities/Exchange<br><input checked="" type="checkbox"/> 890 Other Statutory Actions<br><input type="checkbox"/> 891 Agricultural Acts<br><input type="checkbox"/> 893 Environmental Matters<br><input type="checkbox"/> 895 Freedom of Information Act<br><input type="checkbox"/> 896 Arbitration<br><input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision<br><input type="checkbox"/> 950 Constitutionality of State Statutes |
| <b>REAL PROPERTY</b><br><input type="checkbox"/> 210 Land Condemnation<br><input type="checkbox"/> 220 Foreclosure<br><input type="checkbox"/> 230 Rent Lease & Ejectment<br><input type="checkbox"/> 240 Torts to Land<br><input type="checkbox"/> 245 Tort Product Liability<br><input type="checkbox"/> 290 All Other Real Property  | <b>CIVIL RIGHTS</b><br><input type="checkbox"/> 440 Other Civil Rights<br><input type="checkbox"/> 441 Voting<br><input type="checkbox"/> 442 Employment<br><input type="checkbox"/> 443 Housing/Accommodations<br><input type="checkbox"/> 445 Amer. w/Disabilities - Employment<br><input type="checkbox"/> 446 Amer. w/Disabilities - Other<br><input type="checkbox"/> 448 Education   | <b>PRISONER PETITIONS</b><br><b>Habeas Corpus:</b><br><input type="checkbox"/> 463 Alien Detainee<br><input type="checkbox"/> 510 Motions to Vacate Sentence<br><input type="checkbox"/> 530 General<br><input type="checkbox"/> 535 Death Penalty<br><b>Other:</b><br><input type="checkbox"/> 540 Mandamus & Other<br><input type="checkbox"/> 550 Civil Rights<br><input type="checkbox"/> 555 Prison Condition<br><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

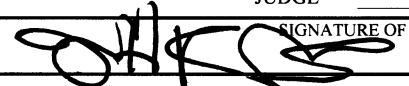
**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing *(Do not cite jurisdictional statutes unless diversity)*:  
Little Tucker Act, 28 U.S.C. § 1346

Brief description of cause:  
FAA violated § 336 of the FAA Modernization and Reform Act of 2012.) (codified at 49 U.S.C. § 40101 note)

**VII. REQUESTED IN COMPLAINT:**     CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.    **DEMANDS**    CHECK YES only if demanded in complaint:    **JURY DEMAND:**     Yes     No

**VIII. RELATED CASE(S) IF ANY** *(See instructions):*    JUDGE \_\_\_\_\_    DOCKET NUMBER \_\_\_\_\_

DATE: 06/12/2017    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: [Model Aircraft Hobbyists Sue FAA Administrator Over Fees, Data Storage](#)

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