YOUR NAME

Mailing Address

City, State, ZIP

Phone Number

Your Name

Plaintiff in Pro Per

### **IN THE UNITED STATES DISTRICT COURT FOR THE \_\_\_\_\_\_\_ DISTRICT OF \_\_\_\_\_\_\_**

| \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_,  Plaintiff/Petitioner,  v.  ELON MUSK, DOGE (DEPARTMENT OF GOVERNMENT EFFICIENCY, UNITED STATES TREASURY and DOES 1-#,  Defendant/Respondent | Case No.:  COMPLAINT FOR PRELIMINARY AND PERMANENT INJUNCTIONS, AND FOR DAMAGES    Cal. Code of Civ. Proc. 526(a)    Date: Hearing Date]  Time: Hearing Time  Location: Dept. Department  Judge: Hon. Judge's Name  Date Action Filed: Date Filed    Trial Date: Not Yet Set |
| --- | --- |

**Plaintiff alleges:**

1 **Plaintiff’s Identity and Residency** Plaintiff MYRON WARD is, and at all times mentioned in this complaint was, a natural person residing in Sacramento County, California.

2 **Injunctive Relief** At all times alleged herein, Plaintiff has had a personal right and legal interest in receiving timely and secure unemployment benefits, which are being threatened by the Defendant’s actions and will cause irreparable harm if not enjoined by the Court.

3 **Defendant’s Identity and Duties** Defendant **ELON MUSK** is a person and an individual who holds significant control over DOGE (Department of Government Efficiency). Defendant **DOGE** is a government entity responsible for overseeing the Treasury’s payment systems. **UNITED STATES TREASURY** is the government agency responsible for administering federal benefits, including unemployment payments. Defendants have a legal duty to ensure that unemployment benefits are administered securely and in a timely manner, and they are responsible for the actions threatening to disrupt these essential services.

4 **Fictitious Defendants** Defendants **DOES 1 through DOES #**, inclusive, are sued in this complaint under fictitious names. Their true names and capacities are unknown to Plaintiff. When their true names and capacities are ascertained, Plaintiff will amend this complaint by inserting their true names and capacities herein. Plaintiff is informed and believes and thereon alleges that each of the fictitiously named defendants is responsible in some manner for the occurrences alleged in this complaint and that Plaintiff’s injuries were proximately caused by these defendants.

**FIRST CAUSE OF ACTION**

**(For Preliminary and Permanent Injunction Against Defendants)**

5 **Defendants’ Wrongful Conduct** Beginning on or about [date], Defendants, and each of them, have wrongfully and unlawfully manipulated the Treasury’s payment systems, causing delays and disruptions to the administration of unemployment benefits. Specifically, Defendants’ actions, including [describe specific actions or threats], are causing harm to Plaintiff’s ability to receive timely unemployment benefits.

6 **Demands for Relief** Plaintiff has demanded that the Defendants cease their actions interfering with the Treasury payment system. These demands have gone unmet.

7 **Irreparable Injury** Defendants’ threatened wrongful conduct, unless and until enjoined and restrained by order of this Court, will cause great and irreparable injury to Plaintiff, including the loss or delay of unemployment benefits, which Plaintiff relies on for basic living expenses. The financial harm caused by this disruption cannot be remedied by monetary damages alone.

8 **Inadequate Remedy at Law** Plaintiff has no adequate remedy at law for the injuries threatened by the Defendants’ actions, as an award of monetary damages would not provide an adequate remedy. The only remedy for the Plaintiff is injunctive relief to prevent further harm and restore the proper functioning of the federal unemployment benefits system.

**WHEREFORE, Plaintiff prays for judgment against Defendants as follows:**

1 **For an Order to Show Cause** For an order requiring Defendants to show cause, if any they have, why they should not be enjoined as set forth in this complaint during the pendency of this action;

2 **For a Preliminary Injunction and Permanent Injunction** For a preliminary injunction and a permanent injunction, enjoining Defendants and each of them, their agents, servants, and employees, and all persons acting under, in concert with, or for them, from: a. **Actions to Stop**: Enjoining Defendants from manipulating the Treasury’s payment system in any manner that disrupts or delays the administration of unemployment benefits. b. **Actions to Order**: Enjoining Defendants to restore the proper operation of the Treasury payment system to ensure the timely and secure distribution of unemployment benefits.

3 **Monetary Damages** For damages in an amount to be proven at trial, including but not limited to economic loss caused by the disruption of unemployment benefits, and emotional distress arising from the uncertainty caused by the Defendants' actions.

4 **For Costs of Suit** For costs of suit incurred in this action.

5 **For Further Relief** For such other and further relief as the Court deems proper.

**DATED:** [Leave Blank for Date]

**Signature:** MYRON WARD, In Pro Per