

No.

Walter S. Foster

Superior Court

Stamford/Norwalk Judicial District

v.

123 Hoyt Street

Stamford 06905

St. Aloysius Catholic Church Corporation

July 6, 2020

Summary of Complaint

1. Plaintiff asserts that Defendants' Profession of Faith, Celebration of the Christian Mystery, Life in Christ and Christian Prayer, as proscribed in its Catechism, are all designed to reinforce the Defendant's support for anti-choice legislation i.e. support for legislation that restricts access to abortion.
2. Plaintiff alleges that Defendants advocate this anti-choice legislation through their dramatic written and unconditional opposition to abortion in their Catechism which threatens to "excommunicate" any parishioner who has an abortion or "cooperates" in it. and states that abortion "undermines the very foundation of a nation" or in our case, the U.S Government.¹

¹ COMEPENDIUM, Page 138, paragraph 472. All references to the Catechism are from the *Catechism of the Catholic Church* published by the United States Conference of Catholic Bishops, 32111 Fourth Street, NE, Washington D.C. 20017-1194. English Translation dated March 2006. ISBN number: 978-1-57455-720-6. When providing quotations, **Page Numbers** are the page numbers and **Paragraph Numbers** are paragraph numbers in the COMPENDIUM *Catechism of the Catholic Church*. **Section Numbers** are section numbers in the COMPLETE *Catechism of the Catholic Church*.

3. This anti-choice legislation restricts access to a woman's legal right to an abortion permitted under Conn. Gen. Stat. Ann § 19a-602a and the Supreme Court Case Roe v. Wade, 410 U.S. 113 (1973).
4. More specifically, Plaintiff claims that Defendants influenced Representative Tom O'Dea's actions on anti-choice legislation in the House of Representatives representing the 125th District, encompassing parts of Wilton and New Canaan.
5. As Deputy Republican Leader at Large beginning in the 2019 session and a representative of the House of Representatives, his decisions were influenced by Defendants on whether to act on or comment on legislation² that restricts access to abortion including:
 - a. Conn. Agencies Regs. §19-13-D54(d)(9) where the state, without reference to medical necessity, requires outpatient clinics that are operated by corporations or municipalities and that provide abortion services (at any stage of pregnancy) to have a standard operating room.
 - b. Conn. Gen. Stat. Ann. §19a-116 (Enacted 1979; Last Amended 1995); and Conn. Agencies Regs. §19a-116-1(d) where the state requires that clinics must hire counselors who have or who are supervised by a person with a graduate degree or training in social work, psychology, counselling, nursing, or ministry.
 - c. Conn. Agencies Regs. §19-13-D54(c) where the state requires that all abortions after the second trimester be provided in a hospital.

² "Legislation includes actions by Congress, any state legislature, any local council or similar governing body, with respect to acts, bills, resolutions or similar items (such as laws, legislative confirmation of appointive office or by the public in referendum, ballot initiative, constitutional amendment or similar procedure." Compliance Guide for 501(c)(3) Public Charities

- d. Conn. Agencies Regs. §19-13-D54(a) (Enacted 1974; Last Amended 2005) where the state requires that only a physician licensed to practice medicine and surgery in the state may provide abortion services. And,
 - e. Currently on S.B. 144 -- an act concerning deceptive advertising practices of limited service pregnancy centers.
- 6. Defendants influence on legislation comes from its dogma that asserts that an infallible Pontiff and College of Bishops have decided that their definition of a human person begins at the moment of conception and that, based on Moses fifth commandment, "thou shalt not kill," abortion is murder.
 - 7. This assertion reinforces religious dogma over current law and is accompanied by an implied threat to parishioners with excommunication if they fail to support legislation that restricts access to abortion.
 - 8. The fact that a significant portion of Representative O'Dea's electorate (Defendants) are strongly unified in their efforts to oppose any representative who fails to restrict access to abortion is prima facia evidence that his position is influenced by Defendant's repeated, written and unequivocal opposition to abortion.
 - 9. Therefore, Plaintiff alleges that Defendants violate Section 501 (c)(3) of the Internal Revenue Code that provides tax benefits to organizations that comply with federal tax law.
 - a. This code states that an organization to be exempt "must not engage in *substantial legislative activity. . . and that an organization will be regarded as*

attempting to influence legislation if it advocates the adoption or rejection of legislation.”³

- b. A threat of excommunication if a parishioner fails to cooperate in supporting legislation that’s restricts access to abortion is an attempt to influence legislation.
 - c. An unequivocal written platform that proclaims that abortion is murder is an attempt to influence legislation.
10. Influencing legislation is in violation of its requirement as a 501(c)3 Public Charity to refrain from such activity. Therefore, Defendant should not be granted tax exempt status and be required to pay real estate taxes on its real estate property in New Canaan.
11. Increased real estate tax payments from Defendant would have reduced real estate tax assessments for all other New Canaan real estate tax payers, including Plaintiff. Plaintiff claims reimbursement for the extent to which his fiscal 2020 New Canaan real estate taxes would have been reduced if Defendant had been required to pay real estate taxes.

Details of Complaint

12. Defendant has real estate in New Canaan with an assessed value of \$13,833,260. The mill Rate in the Town of New Canaan for fiscal 2020 was 18.24. If Defendant were not tax-exempt it would have had to pay \$251,904 in fiscal 2020 taxes ($\$13,833,260 \times .01814$). If Defendant had to pay taxes of \$251,904 it would have reduced the total taxes of \$140,000,000 assessed by the Town of New Canaan in fiscal 2020 by .18% ($\$251,904 \div \$140,000,000$).

³ Compliance Guide for 501(c)(3) Public Charities of the Internal Revenue Code – *Legislative Activities, Page 2*. (See Exhibit 1)

13. Plaintiff paid Motor Vehicle taxes in fiscal 2020 of \$119 and Personal Property Taxes of \$20 (in the name of Walter S. Foster) and Real Estate Taxes of \$8,316 (in the name of Elizabeth Greer Foster) for a total of \$8,455. Increased real estate tax payments from Defendant would have reduced real estate tax assessments for all other New Canaan real estate tax payers, including Plaintiff. If Defendant had to pay taxes, Plaintiff's New Canaan taxes would have been reduced by approximately .18% or \$15.21 ($\$8,455 \times .18\%$). Plaintiff is therefore suing Defendant for \$15.21.

Defendants' teachings from the Catechism

14. The Catechism of the Catholic Church sums up, in book form, the beliefs of Defendants.

- a. Defendants are bound by the Pope and the United States Conference of Catholic Bishops to "go forth and teach" the transmission of the divine revelation as contained in the Catechism of the Catholic Church in accordance with the apostolic tradition.⁴
- b. These elements of faith are declared by Defendant to be "definitive and infallible".⁵
- c. The Catechism on abortion states "*Because it should be treated as a person from conception, the embryo must be defended in its integrity, cared for, and treated like every other human being.*"⁶

⁴ COMPENDIUM, Page 8, Paragraphs 11-15. The Transmission of Divine Revelation.

⁵ COMPENDIUM, Page 52. Paragraph 185. Infallibility is exercised when the Roman Pontiff, in virtue of his office as the Supreme Pastor of the Church, or the College of Bishops in union with the Pope, especially when joined together in an Ecumenical Council, proclaim by a definitive act **a doctrine pertaining to faith or morals**. . . . Every one of the faithful must adhere to such teaching with the obedience of faith.

⁶ COMPLETE Section 2323

15. Paragraph 470 states that the Fifth Commandment of the Ten Commandments-- *You Shall Not Kill* forbids as gravely contrary to the moral law *direct abortion, willed as an end or as means, as well as cooperation in it. Attached to this sin is the penalty of excommunication because from the moment of his or her conception, the human being must be absolutely respected and protected in its integrity:*
16. Paragraph 472 states that any state that allows abortion denies "*the inalienable right to life of every individual from the first moment of conception that is a constitutive element of civil society and its legislation. When the state does not place its power in the service of the rights of all and in particular of the more vulnerable including unborn children, the very foundation of a State based on law are undermined*".
17. Or, as stated more fully in the COMPLETE Sections 2270-2275 on Abortion:
- a. **Section 2270:** *Human life must be respected and protected absolutely from the moment of conception. From the first moment of his existence, a human being must be recognized as having the rights of a person—among which is the inviolable right of every innocent being to life.⁷ Before I formed you in the womb, I knew you, and before you were born, I consecrated you.⁸ My frame was not hidden from you, when I was being made in secret, intricately wrought in the depths of the earth.⁹*
- b. **Section 2271:** *Since the first century the Church has affirmed the moral evil of every procured abortion. This teaching has not changed and remains unchangeable. Direct abortion, that is to say, abortion willed either as an end or*

⁷ CDF, *Donum vitae* 1, 1.

⁸ *Jer* 1:5, cf. *Job* 10:8-12; *Ps* 22:10-11

⁹ *Ps* 139:15.

a means, is gravely contrary to the moral law: You shall not kill the embryo by abortion and shall not cause the newborn to perish.¹⁰ God, the Lord of life, has entrusted to men the noble mission of safeguarding life, and men must carry it out in a manner worthy of themselves. Life must be protected with the utmost care from the moment of conception: abortion and infanticide are abominable crimes.¹¹

- c. **Section 2272:** Formal cooperation in an abortion constitutes a grave offense.

The Church attaches the canonical penalty of excommunication to this crime against human life. A person who procures a completed abortion incurs excommunication latae sententiae,¹² "by the very commission of the offense," and subject to the conditions provided by Canon Law.¹³ The Church does not thereby intend to restrict the scope of mercy. Rather, she makes clear the gravity of the crime committed, the irreparable harm it does to the innocent who is put to death, as well as to the parents and the whole of society.

- d. **Section 2273:** The inalienable right to life of every innocent human individual is a constitutive element of a civil society and its legislation: The inalienable rights of the person must be recognized and respected by civil society and the political authority. These human rights depend neither on single individuals nor on parents, nor do they represent a concession made by society and the state: they belong to human nature and are inherent in the person by virtue of the creative

¹⁰ *Didache* 2, 2: SCh 248, 148 cf. *Ep Barnabae* 19,5:PG 2, 777, *Ad Diognetum* 5, 6: PG 2, 1173; Tertullian, *Apol.* 9: PL 1, 319-320

¹¹ GS 51 Section 3.

¹² CIC, can. 1398

¹³ Cf. CIC, cann. ,1323-1324

act from which the person took his origin. Among such fundamental rights one should mention in this regard every human being's right to life and physical integrity from the moment of conception until death.¹⁴ The moment a positive law deprives a category of human beings of the protection which civil legislation ought to accord them, the state is denying the equality of all before the law. When the state does not place its power at the service of the rights of each citizen, and in particular of the more vulnerable (embryo), the very foundations of a state based on law are undermined. As a consequence of the respect and protection which must be ensured for the unborn child from the moment of conception, the law must provide appropriate penal sanctions for every deliberate violation of the child's rights.¹⁵

- e. **Section 2274:** Since it must be treated from conception as a person, the embryo must be defended in its integrity, cared for, and healed as far as possible, like any other human being. Prenatal diagnosis is morally licit, "if it respects the life and integrity of the embryo and the human fetus and is directed toward its safeguarding or healing as an individual. It is gravely opposed to the moral law when this is done with the thought of possibly inducing an abortion, depending upon the results: a diagnosis must not be the equivalent of a death sentence."¹⁶*
- f. **Section 2275:** One must hold as licit procedures carried out on the human embryo which respect the life and integrity of the embryo and do not involve disproportionate risks for it, but are directed toward its healing, the improvement*

¹⁴ CDF, *Donum vitae* III.

¹⁵ CDF, *Donum vitae* III.

¹⁶ CDF, *Donum vitae* 1, 2.

of its condition, health, or its individual survival.¹⁷ It is immoral to produce human embryos intended for exploitation as disposable biological material.¹⁸ Certain attempts to influence chromosomal or genetic inheritance are not therapeutic but are aimed at producing human beings elected according to sex or other predetermined qualities. Such manipulations are contrary to the personal dignity of the human being and his integrity and identity¹⁹ which are unique and unrepeatable.

Defendants' Teachings and the Law:

18. COMPENDEUM Paragraphs 470 & 472 and COMPLETE Sections 2270-2275 are antithetical to the laws of CT and the United States.

- a. The CT Freedom of Choice Act (Conn. Gen. Stat. Ann §19a-602) states "The decision to terminate a pregnancy prior to the viability of the fetus shall be solely that of the pregnant woman in consultation with her physician."
- b. Supreme Court Case Roe v. Wade, 410 U.S. 113 (1973) found that a right to privacy under the due process clause of the 14th Amendment extended to a woman's decision to have an abortion. Later, in Planned Parenthood v. Casey (1992), the Court affirmed its central holding of a woman's right to an abortion.

Conflicting Church Teachings

19. Even the Catholic Church recognizes its inconsistency in its opposition to a woman's "choice" over whether or not to have an abortion. Its dictate on the right of individuals to have a right to exercise the freedom of choice are in direct contrast to its opposition to the

¹⁷ CDF, *Donum vitae* I,3.

¹⁸ CDF, *Donum vitae* I,5.

¹⁹ CDF, *Donum vitae* I,6.

right of an individual to terminate a pregnancy due to rape incest or genetic deformities or when the mother's life is endangered.

20. The Compendium states in paragraph 365 *"the right of the exercise of freedom belongs to everyone because it is inseparable from his or her dignity as a human person."*

*Therefore, this right must always be respected, especially in moral and religious matters, and it must be recognized and protected by civil authority within the limits of the common good and a just public order.*²⁰

21. Or again, the COMPLETE Catechism states in Section 1738 *"freedom is exercised in relationships between human beings. Every human person, created in the image of God, has the natural right to be recognized as a free and responsible being. All owe to each other this duty of respect. The right to the exercise of freedom, especially in moral and religious matters is an inalienable requirement of the dignity of the human person. This right must be recognized and protected by civil authority within the limits of the common good and public order."*²¹

22. Similarly, its description of the authority exercised in legitimate ways in Paragraph 406 is in direct opposition to its illegitimate exercise of authority restricting abortion.

"Authority is exercised legitimately when it acts for the common good and employs morally licit means to attain it. Therefore, political regimes must be determined by the free decisions of their citizens. They should respect the principle of the "rule of law" in which the law and not the arbitrary will of some (i.e. the Pope), is sovereign. Unjust

²⁰ COMPENDIUM, Page 109, Paragraph 365

²¹ COMPLETE Section 1738

*laws and measures (i.e. dogmas) contrary to the moral order are not binding in conscience.*²²

Plaintiff's Claim

23. Plaintiff claims the question of the moment a fetus becomes a human being should be determined by U.S. law, not by a Pope's or Ecumenical Council's interpretation of Moses' two-thousand-year-old religious commandment "Thou shalt not kill". In this case Defendants are failing to "render unto Caesar those things that are Caesar's" by failing to render unto the United States respect for the laws of the country.²³ And Plaintiff's threat of ex-communication to parishioners supporting better access to abortion constitutes a clear and present attempt to influence legislation through punishment to parishioners who disagree.
24. Defendants are like an elephant in the room. No politician needs a poll to find out how many parishioners of Defendants' congregation are opposed to abortion. The congregation's vehement objections are all found in their Catechism and in the infallible dictates of a foreign dictator – the Pope.
25. The Plaintiff, therefore, asserts that it is overwhelmingly obvious that Defendants devote a "*portion of their activities*" to ensuring its parishioners, as citizens, influence legislation restricting access to abortion consistent with its Catechism.²⁴ The question

²² COMPENDIUM, Page 117, Paragraph 406

²³ Mark 12:17. "Render unto Caesar the things that are Caesar's and unto God the thing that are Gods"

²⁴ It is important to remember this suit is not about Defendant's fundamental right as a religious organization to its own beliefs and practices guaranteed under the 1st Amendment of the Constitution nor about Defendant's opposition to abortion. Rather, this suit is only about the requirement of the Internal Revenue Service, that as a tax-exempt organization, Defendant

remains, however, as to whether Defendants devote a “*substantial part of their activities to influencing legislation.*”²⁵

26. “*The substantial part test determines substantiality on the basis of all the pertinent facts and circumstances in each case. The IRS considers a variety of factors including the time and expenditure devoted by the organization to the activity when determining whether the lobbying activity is substantial*”.

27. Since the key element of Defendants’ influence on its parishioners is its power of “excommunication”, any time and expenditure devoted to sustaining a member’s faith in the Catholic Church increases that parishioner’s belief in the importance of supporting legislation restricting access to abortion.

28. For example, all the Defendant’s non-political activities incorporate this central anti-choice dogma. Defendants are known for their support for hospitals and for the less fortunate. But the qualification for Defendants’ support of these activities is the beneficiaries support of anti-choice activities. Catholic hospitals do not allow abortion or family planning in their hospitals and the help for the less fortunate is limited to charitable organizations that do not support family planning.

29. While Defendants have different practices from other churches in New Canaan, nowhere is the difference so dramatic as it is on abortion.

a. For example, St Mark’s Church and the New Canaan Congregational Church allow female ministers. However, no-where does Defendant’s Catechism state

refrain from having a significant portion of its activities attempting to influence legislation i.e. in this case influence abortion related legislation.

²⁵ Compliance Guide for 501(c)(3) Public Charities of the Internal Revenue Code – *Legislative Activities*, Page 2. (See Exhibit 1)

that having female ministers “destroys the fabric of US society” or that having female ministers is the equivalent to “murder”.

30. It is the vehemence of Defendant’s opposition to abortion that pushes it over the line from merely being a difference of opinion to an attempt to influence legislation.

Defendants opposition to abortion is more severe than it is to any other crime including intentional homicide or first-degree murder. In the Catholic Catechism, first degree murder does not even require excommunication.²⁶ In contrast, first degree murder under CT and US law can result in the death penalty, while committing an abortion is not only **not** a crime under CT and US law, it is a **constitutional right**. Furthermore, the crimes of pedophilia and sexual assault and harassment, for which the Catholic Church has been repeatedly accused, are not even mentioned as a sin in the Catholic Catechism even though they are serious crimes under CT and US law and can result in indefinite civil commitment.

31. Because religious freedom and the first amendment are such a fundamental part of US political history it is necessary to take a moment to clarify what this suit is not about.

a. This case is not about the right of the Defendants to their belief about the evils of abortion, though it is about the limitations of applying a 2000-year-old religious commandment “Thou shalt not kill” over current political legislation and supreme court rulings abortion is not murder but “a woman’s right”.

b. This case is not about the right of the Catholic Church to support moral values, family, and help for the weak, though it is about the right of a foreign leader to claim the infallible right to decide for the US what is and what is not murder.

²⁶ COMPLETE 2268-2269

- c. This case is not about the right of the Defendants to educate and support moral values and good citizenship, though it is about their right to deny women the fundamental rights included in our laws, Constitution and Declaration of Independence.
32. This case is only about Plaintiff's claim, on the basis of the preponderance of evidence, that Defendants, through their unequivocal dogma, expend a substantial amount of their energies attempting to influence legislation that restricts a woman's fundamental right to choose.
33. Defendants explicitly state and reinforce the unamerican view that a foreign power, the Vatican, and a foreign ruler, the Pope, can dictate whether or not the United States Government is guilty of murder and injustice. And because of its overwhelming, vehement opposition to abortion, it influences legislation by threatening its congregation with ex-communication and pro-choice elected officials with defeat.
34. Plaintiff notes that this case only applies to the Catholic Church because no other Church acts as a foreign power, claims infallibility, and threatens excommunication to those who have an abortion or 'cooperate in' abortion.
35. Plaintiff also notes that this case only applies to St. Aloysius Catholic Church which has taken no efforts to reconcile their conflict between their dogma and US law.
36. Other Catholic Churches could have:
- a. Given sermons mitigating the severity of their Catechism's condemnation of abortion.
 - b. Given contributions or cooperation with Catholics For Choice as a means of lessening the severity of the threat of excommunication.

- c. Written letters to the Archdiocese raising concerns about the perception of the Church 's views and U. S. Laws
- d. Written letters to the pope asking for a change to the Catechism that reduces the condemnation of the U.S. Government for its laws on abortion.
- e. Held outings of church elders to discuss the harm to non-Catholics from restricting access to abortion in cases of rape, incest, genetic abnormalities and threats to the life of the mother.

37. Although the First Amendment²⁷ to the Constitution of the United States declares that “Congress shall make; no law respecting an establishment of religion or prohibiting the free exercise thereof” that has not stopped states from making laws limiting religious dogma that causes gross injustices such as laws outlawing polygamy²⁸.

Polygamy

38. A federal law forbade polygamy in 1862. The law was challenged by Mormon fundamentalist sects as a violation of the Constitution's guarantee of freedom of religion but was upheld by the Supreme Court (Reynolds v. U.S., 98 U.S. 145, 164 (1878).) The Court argued:

- a. The practice was odious' and offends society.

²⁷ First Amendment – “Congress shall make no laws respecting an establishment of religion, or prohibiting the free exercise thereof, or abridging the freedom of speech or of the press; or the right of the people; peaceably to assemble, and to petition the Government for a redress of grievances.”

²⁸ Polygamy is the act or condition of a person marrying another person while still being lawfully married to another spouses. It is illegal in the United States. The crime is punishable by a fine, imprisonment, or both according to the law of the individual state and the circumstances of the offense...There are laws against the practice in all 50 states. Because state laws exist, polygamy is not actively prosecuted at the federal level -- U.S. Laws and Senate Hearing on Polygamy and religious tolerance, (<http://www.religious tolerance.org/polylaw.htm>)

- b. The Constitution's framers had accepted the English law banning polygamy; therefore, they couldn't have intended for the freedom of religion clause to sanction it, and (most relevant today),
- c. While the government cannot enact laws that ban beliefs, they can pass laws that forbid actions.

39. As a result, Polygamy is illegal in every state and is classified as a Class D felony under 2005 Connecticut Code -Sec. 53a-190.

Abortion

40. Defendant's attempts to restrict access to abortion is "odious and offends society".

Having an all-male, old, infallible foreign leader and clergy who have never menstruated or been pregnant determine access to abortion is an injustice that threatens justice everywhere.

41. Defendant's position on abortion is also odious because it contradicts our basic constitutional rights and our culture.

42. Defendant's position on abortion does not allow abortions even for pregnancies that occur from rape, incest or from genetic abnormalities, such as Down Syndrome.

Therefore, Defendant's position on abortion also violates the 8th amendment²⁹ – the right to freedom from cruel and unusual punishment. Preventing a woman who becomes pregnant from rape or incest or has a genetically defective embryo from having an abortion is subjecting her, for the rest of her life, to the cruel and unusual punishment of

²⁹ Eighth Amendment – "Excessive bail shall not be required, nor excessive fines imposed, nor cruel and unusual punishments inflicted."

having to raise and provide for a rapist's or sexual predator's child or for a genetically deformed child – clearly a “cruel and unusual punishment”.

43. Similarly, Defendant's position on abortion also violates the 13th amendment³⁰ prohibiting involuntary servitude. Legislation that restricts a women's right to an abortion potentially condemns these women to the involuntary servitude of nurturing and raising an unwanted child that costs \$140,000,³¹ a child that they would not necessarily have chosen had they had the choice. Clearly this is a life sentence of “involuntary servitude”.

44. Finally, Defendant's position on abortion violates a women's right to the pursuit of happiness under the Declaration of Independence since in the Catholic Church this right is decided **only** by men and therefore fails to give women the right to vote. The Catechism that determines the dogma of the Catholic Church is decided by the Pope, 5,237 bishops, and 415,792 priests, all of whom are men.³² Therefore, women are not allowed to have input in the spiritual teaching of Defendant, in contrast to a woman's right to vote that is allowed under the 19th amendment³³ to the Constitution and a woman's right to the pursuit of happiness under the Declaration of Independence.

45. Defendants have refrained from even making any efforts to be an “American Catholic Church” rather than just a “Roman Catholic Church”. They are controlled by Rome in the

³⁰ Thirteenth Amendment – “Section 1 – Neither slavery nor involuntary servitude, except as punishment for crime whereof the party shall have been duly convicted, shall exist within the United States or any place subject to their jurisdiction.

³¹ According to the Department of agriculture the personal costs to raise a child to 18 in a lower income family is \$140,000.

³² Wikipedia - Catholic Church

³³ 19th Amendment – The right of citizens of the United /Stats to vote shall not be denied or abridged by the United State or by any State on account of sex.

same sense that Chinese Companies are recognized today as being controlled by the Chinese Government and therefore restricted in their access to military and technological research.

46. Therefore, while "government cannot enact laws that ban beliefs", it can "pass laws that restrict behavior that influences legislation" for 501(c)(3) public charities.

Conclusion


47. Therefore, Plaintiff argues that because of Defendants:

- a. explicit, repeated and open declarations opposed to CT and US law,
- b. explicit threat to excommunicate parishioners who have an abortion or cooperate in abortion,
- c. and support for legislation limiting access to abortion;

Defendants have attempted to influence legislation and should be denied the right to Tax Exemption under IRS 501(c)(3).

48. As a result, Plaintiff asks the court to award him the difference of \$15.21 between what he paid in New Canaan taxes and what he would have had to pay if Defendants had not been granted tax exempt status.

The Plaintiff



Walter S. Foster

35 Canaan Close

New Canaan CT 06840

203 966 8804

No.

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Superior Court

Stamford/Norwalk Judicial District

123 Hoyt Street

at Stamford

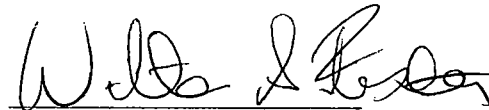
July 6, 2020

Prayer for relief

Wherefore, the Plaintiff prays for the following relief:

1. Money damages.
2. Costs
3. Such other relief as the court deems fair, just and equitable.

The Plaintiff

A handwritten signature in black ink, appearing to read 'Walter S. Foster', written over a horizontal line.

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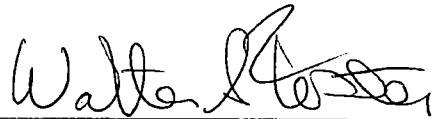
at Stamford

July 6, 2020

Statement of Amount in Demand

Is less than two thousand five hundred dollars exclusive of interest + costs.

The Plaintiff

A handwritten signature in black ink, appearing to read "Walter S. Foster", is written over a horizontal line.

Walter S. Foster

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New Canaan CT 06840

203 966 8804