

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

TAREK FARAG Plaintiff, v.	Civil Action No Judge:
DONALD J. TRUMP, in his official capacity as President of the United States; U.S. DEP. OF HOMELAND SECURITY; JOHN KELLY, in his official capacity as Secretary of Homeland Security; U.S. DEPARTMENT OF STATE; REX TILLERSON, in his official capacity as Secretary of State; the UNITED STATES OF AMERICA; and OTHER UNKNOWN DEFENDANTS. Defendants.	

COMPLAINT FOR DECLARATORY, INJUNCTIVE, AND OTHER RELIEF
NATURE OF THE CASE

1. Plaintiff seeks an Order declaring the elements that exclude a religion from the constitutional protection and ban its members from practicing it or entering the USA; compel the defendants to enforce our immigration laws; enjoin the Government Officials from admitting the president of Egypt or any other official from other countries that violates the freedom of religion; compensate Plaintiff for his damages; and for other relief.

JURISDICTION AND VENUE

2. This Court has Federal Jurisdiction under 28 USC § 1331, the Administrative Procedure Act (“APA”), the Immigration and Nationality Act (“INA”), and other statutes.
3. The Court is authorized to award the requested declaratory, injunctive, and other relief under 28 USC §§ 2201-2202, and the APA, 5 USC § 706.
4. Venue is proper in this District pursuant to 28 USC § 1391.

INTRODUCTION

5. Tarek Farag, a US Citizen, brings this action to protect himself, family, and society; from the

intentional and unintentional negligence of the defendants and other **unknown defendants** in **enforcing our laws, protecting our constitution, and protecting the wellbeing** of all citizens.

6. The miserable failures of the defendants to protect the country as demonstrated by the attacks of terrorists and losses of lives, made him feel **unsafe**, **terrified**, and **costing** him a lot of **time** and **money**. For example, when he flies he pays money to the government to torture him in long and time-consuming security lines, and allow strangers to humiliate him and invade his privacy.

7. People are confused about the **EXISTING limitations and EXCEPTIONS** of the Freedom of Religion under the Constitution, which does not give absolute protection to religions just because they call themselves religions, **they must comply with the Constitution and the Laws**.

8. Our Legislators enacted Immigration Laws that the President cannot override by executive orders, and **must enforce them** especially **against** the ones that **break them** (illegal immigrants).

9. There is news that Elsis, the president of Egypt, is coming to the USA to discuss with the defendants ways to fight Terrorism, while he supports ISIS and **persecutes Christians** in Egypt.

CAUSES OF ACTION

COUNT I LIMITATIONS ON THE FREE EXERCISE OF RELIGION

10. 42 US Code § 2000bb-1 guarantee the free exercise of religion, with the exception only if the government demonstrates that application of the burden to the person (1) is in furtherance of a compelling governmental interest; and (2) is the least restrictive means - - - - -.

11. Any **ideology or religion** (hereinafter **Belief**) that its teachings adopts, supports, or promotes **just one element** of the following, are against our Constitution and laws and should be banned:

- 1) Forcing others (or its converts) to join their Belief by: murder, violence, expulsion, financial pressure, protection taxes, or deprivation of their human or constitutional rights.
- 2) Depriving others from their religious freedom, which include but not limited to: harshly criticizing, analyzing, disputing, joining or leaving **any Belief**; worshiping,

preaching, praying, practicing, possession and distribution of religious literature, or establishing places of assembly or prayer according to **their own Belief**.

3) Any acts of: detention, interrogation, imposition of an onerous financial penalty, forced labor, forced mass resettlement, imprisonment, forced religious conversion, forcibly compelling non-believers or non-theists to recant their beliefs or to convert, beating, torture, mutilation, rape, enslavement, murder, and execution.

4) **Discriminating against others** based on religion, origin, gender, etc.

5) Having **contradicting teachings** (e.g. teaches in one part to kill the disbelievers and in other part teaches to love and make peace with the disbelievers).

6) **Using deception** and misrepresentation of its teachings to spread its Belief.

12. A person declaring that he/she **will not practice**, the teachings of **his BELIEF** that are **INCOMPLIANT** with our Constitution and laws, should be banned, because this will make him/her a potential hidden member of that Belief. E.g., we cannot allow a person saying that he is a Nazi to practice Nazism by accepting his swearing that he is not a racist or anti-Semitic. A Nazi is a Nazi, no such thing as moderate Nazi, extreme Nazi, or partially Nazi.

13. Not clarifying the above limitations clearly, allowed people that should have been banned from practicing their Belief and from entering the US caused serious harm to the citizens, which caused Farag loss of money and continuous fear for his life, family, property, and community.

COUNT II TRUMP IS PLANNING TO ADMIT ELSISI VIOLATING THE LAW

14. 8 US Code § 1182(G) prevent the admission of foreign government officials who have committed particularly severe **violations of religious freedom**.

15. The defendants are inviting Elsis, the president of Egypt, to a meeting in the USA.

16. Elsis came to power after his military coupe in Egypt. He formed a team, mostly of extreme Islamists, to enact an Islamic Constitution that discriminates against non-Muslims and declares

Egypt an Islamic country, and Islamic Sharia law is the superior law above the Constitution.

17. Lately, Elsisi enacted Sharia Law rules that restrict the repairs of Churches or building of new ones, while pretending to give Christians more freedom to do so.

18. Following are some of the sufferings of Christians that Elsisi ignored or encouraged:

a) A group of lawyers presented to Elsisi a file containing more than 500 cases of criminal kidnappings (under the Egyptian code) of Christian UNDERAGE girls that were forced to Islam and to MARRY Moslems. Elsisi refused to take any action because Sharia Law prohibits these girls from converting from Islam, they now joined the best religion (Islam) and it is in their best interest not to become Infidels. They must stay away from their families forever to avoid their pressure, irrespective of being underage.

b) In one day, about 80 Churches were looted and burned, along with tens of Christian homes and businesses. Up until now, no victim was compensated, and no perpetrator was questioned or arrested in spite of the overwhelming evidence against them.

c) Three children (ages under 14) were sentenced to 3 years in prison plus huge financial penalty for producing a short video clip mocking ISIS. An Islamic judge considered the video insulting to Islam because it showed some of its facts. After few seconds from calling the case, and without trial, the Judge ordered their immediate imprisonment without posting bonds (against the rules) and without waiting for the order to be final.

d) On May 20, 2016, in the village of AlKarm (Minya-Egypt), a mob of more than 300 armed Moslems attacked, looted, burned the homes of Christian families, and stripped naked an old woman and paraded her in the street,. The police arrested the five Christian victims and 1 Moslem man, and the victimized families were expelled from the village.

e) In December 2016, an explosion in Cairo Cathedral killed and injured more than 100. Many believe that the security forces orchestrated it to blame Islamic terrorists to show

that Elsis is fighting terror. Elsis ordered the authorities to close the investigations and the army to repair the Cathedral quickly to **destroy the evidence**.

f) Elsis pardoned 200 imprisoned terrorists ignoring tens of unjustly jailed Christians.

g) In February 2017, many Christians were brutally killed (burned alive in front of their families) in the city of El Arish (Sinai-Egypt). Both the police and the army **refused to protect Christians**, forcing the expulsion of more than 100 families from the city.

19. Elsisi as a military man and a leader of the intelligence apparatus supports the Islamic terror, while **playing its card** by pretending to fight it. It is impossible for Trump to rely on Elsis to fight terrorism, knowing that the Egyptian military is devoting most of its resources to invest in the civilian sector hoping to increase its share in Egypt's GDP to more than 55%.

20. From the above, it is immoral, useless, and in violation of the law to admit Elsis to the USA. The Court should enjoin Defendants from inviting Elsis or admitting him to the USA.

COUNT III COMPEL THE DEFENDANTS TO ENFORCE OUR LAWS

21. Plaintiff migrated to the USA about 30 years ago. He waited 10 years to get his turn plus 5 years to become a citizen, to be able to file applications for the immigration of his family members, which allowed these families to migrate after about 15 years from applying.

22. These families' turn to migrate came after about 20 years from the immigration of Plaintiff. The parents of these families were close to the retirement age, most of their children passed the age of 21, and could not migrate with their parents. As a result, one family abandoned the migration. The parents only of the second family migrated, but were divided between staying in the USA and visiting their children that most of them had children. The parents of the third family came to the USA with two of their children leaving one, but could not stay as one family and the parents returned with one child leaving one child to study and work to support himself.

23. Plaintiff believe that a reason for depriving these families from their legal rights to migrate

according to the law, is that the USA is saturated with illegal immigrants that **ILLEGALLY took their turns, caused the separation of these families, and loss of time and money.**

24. DHS estimates the number of **illegal** immigrants in the USA to be close to **11 million**.

25. A respected country would not knowingly allow one citizen to break any law for 1 minute.

Now we have a **disaster of 11 million non-citizens, breaking the law, for many years, stealing the rights of legal immigrants, and demanding us to change our laws to make them legal.**

26. Under Article II of the Constitution, the **President is responsible for the execution and enforcement of the laws** created by Congress, not to make executive orders to suspend the law.

27. The carelessness of the president in enforcing our laws inflicts ongoing harm upon Plaintiff, his family, legal immigrants, many families of legal immigrants, and the society.

28. The court should penalize the President and compel him to execute the law.

PRAYER FOR RELIEF

29. WHEREFORE, Plaintiff Tarek Farag prays that the Court:

- a. **Declare** that any ideology or religion that its teachings adopts, supports, or promotes just one element of any of the elements stated above in paragraphs 11 and 12, are contrary to the Constitution and laws of the United States, and its practice, and the admittance of its followers to the USA, should be banned;
- b. **Grant** Plaintiff a leave to amend his complaint;
- c. **Enjoin** Defendants from admitting Elsis in the USA, and cancel his visit;
- d. **Compel** the President and the Defendants to execute our laws;
- e. **Compensate** the Plaintiff and his family for their damages; and
- f. **Award** such additional and other relief as this Court deems just.

Respectfully submitted,

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Plaintiff: Tarek Farag
Date: March 27, 2017